



3-5 Year Strategic Plan

This document includes Narrative Responses to specific questions that grantees of the Community Development Block Grant, HOME Investment Partnership, Housing Opportunities for People with AIDS and Emergency Shelter Grants Programs must respond to in order to be compliant with the Consolidated Planning Regulations.

GENERAL

Executive Summary

The Executive Summary is optional, but encouraged. If you choose to complete it, please provide a brief overview that includes major initiatives and highlights that are proposed throughout the 3-5 year strategic planning period.

3-5 Year Strategic Plan Executive Summary:

1. EXECUTIVE SUMMARY

This Consolidated Plan provides a basis and strategy for the use of federal funds granted to the City of Lowell by the U.S. Department of Housing and Urban Development under the Community Development Block Grant (CDBG), Home Investment Partnership (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs. This Consolidated Plan covers the period beginning July 1, 2005 through June 30, 2010, including five program years. Programs and activities described in this plan are intended to primarily benefit low- and moderate-income residents of the City of Lowell, neighborhoods with high concentrations of low- and moderate-income residents, and the city as a whole. HOPWA funds will be distributed to eligible activities throughout Middlesex County. The City also uses this plan to coordinate with other federal and state grant programs and local initiatives.

This plan is the product of extensive public outreach, multiple public hearings, and consultation with over 100 agencies, groups, and organizations involved in the development of affordable housing, creation of job opportunities for low- and moderate-income residents, and/or provision of services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. A complete draft of this plan has been made available for public review and comment for a 30-day period beginning March 28, 2005. The availability of both the draft plan and the final plan is advertised in the local newspaper and the complete documents are available for review on the City's website (www.lowellma.gov) and in print form at the Division of Planning and Development, the Pollard Memorial Library, and the Office of the City Clerk.

VISION

In 2003, the Lowell City Council endorsed a Comprehensive Master Plan for the Lowell. The Master Plan established a comprehensive and shared vision of the future with four core components (a complete copy of the Master Plan can be viewed on the City's website at http://www.lowellma.gov/depts/dpd/master_plan):

1. Lowell should be a "lifetime city," a place where people can enjoy all stages of life at a variety of income levels. People should be able to find desirable, appropriate, and affordable residential opportunities for all stages of life within Lowell's city limits.
2. Lowell should have a creative workforce that supports a diverse base of employment, retail, and commercial opportunities that meet the needs of the community and capitalizes on the City's historic, cultural, natural, and educational resources.
3. Lowell should offer a high quality of life for both current and new residents, while striving to protect and promote the unique character of its neighborhoods.
4. Lowell should retain an independent identity as a unique city, even as it becomes more closely connected to Greater Boston, to preserve the community's pride of place.

Building on the community vision established by the Master Plan, the Consolidated Plan anticipates using the CDBG, HOME, ESG, and HOPWA programs to supporting activities which:

1. Help insure that Lowell can be a "lifetime city," particularly for those for whom the affordability of housing is a primary impediment.
2. Provide training, education, and employment opportunities to help expand Lowell's workforce particularly by lifting low- and moderate-income residents into stronger positions in that workforce.
3. Strengthen, preserve, and enhance the physical character of and quality of life in Lowell's neighborhoods, including the housing stock, and the public infrastructure and facilities, with particular emphasis on the low- and moderate-income neighborhoods and those areas that benefit all residents of this primarily low- and moderate-income City.
4. Continue to build the capacity of residents to empower themselves to help strengthen their community, address problems, and develop pride in their City.

AVAILABLE FUNDS

The priorities and accomplishment goals outlined in this document are based on assumptions about future funding levels for the Consolidated Plan programs. In all cases, the City of Lowell has used the presumption of level-funding of each program at Federal Fiscal Year 2005 levels as outlined below. Because these programs are subject to annual Congressional appropriations as well as potential changes in funding distribution formulas or the number of communities eligible to receive entitlement grants, the accomplishment projections and planned activities are subject to change with availability of funding.

	CDBG	HOME	ESG	HOPWA	TOTAL
Estimated Annual Entitlement	\$2,678,000	\$1,171,666	\$102,962	\$623,000	\$4,575,628
Estimated Annual Program Income	\$177,500	\$150,000	\$0	\$0	\$375,000
Estimated Annual Funds Available	\$2,855,500	\$1,321,666	\$102,962	\$623,000	\$4,950,628
Five-Year Total Estimated Funds Available	\$14,277,500	\$6,608,330	\$514,810	\$3,115,000	\$24,515,640

SUMMARY OF PRIORITIES, GOALS, BUDGETS, AND ANTICIPATED ACCOMPLISHMENTS

The table below outlines the priority need categories that HUD has found to be eligible to be supported with Consolidated Plan program funds. The chart estimates the amount and percentage of total Consolidated Plan funds that will be spent on each priority need category during the five program years covered by this plan. Below each goal, high and medium priority objectives are also listed. The proposed funding amounts are constrained in many cases by program eligibility requirements and expenditure caps. Program administrative expenses are apportioned within the various priority need categories based on program regulations.

	Priority
GOAL A: HOMELESS/HIV/AIDS - \$3,600,000 (15%) <u>Objectives:</u> 1. Increase the number of homeless persons moving into permanent housing 2. End chronic homelessness 3. Provide housing and supportive services for persons with HIV/AIDS and their families	HIGH HIGH HIGH
GOAL B: NONHOMELESS SPECIAL NEEDS - \$250,000 (1%) <u>Objectives:</u> 1. Increase range of housing options and related services for persons with special needs	MEDIUM
GOAL C: RENTAL HOUSING - \$3,900,000 (16%) <u>Objectives:</u> 1. Increase the supply of affordable rental housing (particularly for households earning 50% of AMI or less) 2. Improve the quality of affordable rental housing 3. Improve access to affordable rental housing 4. Improve access to affordable rental housing for minorities	HIGH HIGH MEDIUM MEDIUM
GOAL D: OWNER-OCCUPIED HOUSING - \$5,000,000 (20%) <u>Objectives:</u> 1. Increase the availability of affordable owner housing 2. Improve the quality of owner housing 3. Improve access to affordable owner housing 4. Improve access to affordable owner housing for minorities	HIGH HIGH HIGH HIGH
GOAL E: PUBLIC FACILITIES - \$5,250,000 (21%) <u>Objectives:</u> 1. Improve quality/increase quantity of neighborhood facilities serving LMI persons 2. Improve quality/increase quantity of facilities that benefit LMI teens and youth 3. Improve quality/increase quantity of facilities that benefit seniors and the elderly	HIGH HIGH HIGH
GOAL F: INFRASTRUCTURE - \$1,500,000 (6%) <u>Objectives:</u> 1. Improve quality/increase quantity of public improvements that benefit LMI persons	HIGH
GOAL G: ECONOMIC DEVELOPMENT - \$3,000,000 (12%) <u>Objectives:</u> 1. Improve economic opportunities for LMI persons 2. Support the implementation of the JAM Urban Renewal Plan 3. Remediate and redevelop brownfields	HIGH HIGH HIGH
GOAL H: PUBLIC SERVICES - \$2,000,000 (8%) <u>Objectives:</u> 1. Improve services for LMI persons	HIGH

2. Improve services for LMI youth and teens	HIGH
3. Improve services for seniors and the elderly	HIGH
4. Improve services for disabled adults	MEDIUM

The plan contemplates allocating program funding to the four primary Master Plan thematic areas as follows.

	Estimated Total Funding	Percentage of Funding
Lifetime City	\$8,600,000	35%
Economic Development	\$3,000,000	12%
Neighborhood Character	\$7,000,000	29%
Capacity Building	\$5,900,000	24%

More detailed priorities for Housing, Community Development, Homeless and Special Needs populations, as well as HOPWA program activities are presented in the appropriate narrative sections and tables within this document.

Strategic Plan

Due every three, four, or five years (length of period is at the grantee's discretion) no less than 45 days prior to the start of the grantee's program year start date. HUD does not accept plans between August 15 and November 15.

Mission:

1. MISSION STATEMENT

In 2003, the Lowell Planning Board and the Lowell City Council adopted a Comprehensive Master Plan to guide the continued redevelopment of the City over the next twenty years. In approving this plan, they endorsed a vision that was developed following an extensive outreach campaign conducted in 2001-2003, involving more than 1200 residents, business, political, and community leaders, to define goals, objectives, policies, and recommendations for the City.

The Master Plan identified two major trends that Lowell will capitalize on. First, after decades of large-scale out-migration from urban centers, Americans from a wide range of backgrounds have begun to once again recognize the vitality and energy of cities and embrace them as unique and desirable places to live. Secondly, as the nation's economy has become increasingly driven by service and knowledge-based industries, corporate location decisions are being driven primarily by access to creative and educated employees who can adapt to today's ever changing work environments. These Creative Class individuals that employers are seeking tend to live in communities that are diverse, lively, possess unique character, and offer a wealth of opportunities for a high quality of life. Lowell's renaissance of the past 25 years has enabled the City to preserve and enhance these very qualities in the community, and the master planning process is designed to build upon the momentum caused by recent revitalization efforts.

Building on these trends, the Master Plan established a comprehensive and shared vision of the future with four core components (the complete Master Plan can be found on the City's website at http://www.lowellma.gov/depts/dpd/master_plan):

1. Lowell should be a "lifetime city," a place where people can enjoy all stages of life at a variety of income levels. People should be able to find desirable, appropriate, and affordable residential opportunities for all stages of life within Lowell's city limits.
2. Lowell should have a creative workforce that supports a diverse base of employment, retail, and commercial opportunities that meet the needs of the community and capitalizes on the City's historic, cultural, natural, and educational resources.
3. Lowell should offer a high quality of life for both current and new residents, while striving to protect and promote the unique character of its neighborhoods.
4. Lowell should retain an independent identity as a unique city, even as it becomes more closely connected to Greater Boston, to preserve the community's pride of place.

This five-year Consolidated Plan provides a blueprint to use the CDBG, HOME, ESG, and HOPWA programs to assist in the implementation of this vision between July 1, 2005 and June 30, 2010, particularly for the low- and moderate-income residents of the City. The Consolidated Plan anticipates supporting programs to:

1. Help insure that Lowell can be a "lifetime city," particularly for those for whom the affordability of housing is a primary impediment.
2. Provide training, education, and employment opportunities to help expand Lowell's workforce particularly by lifting low- and moderate-income residents into stronger positions in that workforce.
3. Strengthen, preserve, and enhance the physical character of and quality of life in Lowell's neighborhoods, including the housing stock, and the public infrastructure and facilities, with particular emphasis on the low- and moderate-income neighborhoods and those areas that benefit all residents of this primarily low- and moderate-income City.
4. Continue to build the capacity of residents to empower themselves to help strengthen their community, address problems, and develop pride in their City.

General Questions

1. *Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed.*
2. *Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) and the basis for assigning the priority (including the relative priority, where required) given to each category of priority needs (91.215(a)(2)).*
3. *Identify any obstacles to meeting underserved needs (91.215(a)(3)).*

3-5 Year Strategic Plan General Questions response:

1. GEOGRAPHIC AREAS OF THE JURISDICTION

Lowell, Massachusetts, the nation's first successful planned industrial community, is located in northern Middlesex County in the northeastern section of Massachusetts. The city is bisected by the Merrimack River and is located approximately 25 miles

north of Boston. Lowell has a land area of 13.38 square miles with the remaining 0.89 square miles covered by surface water. The total area within the Lowell city border is 14.27 square miles. The major bodies of water that have had tremendous impact on the development and success of the City area the Merrimack River and the Concord River.

The city is a diverse urban/suburban community built primarily around the extensive industrial mill complexes along the Merrimack River. The industrial revolution of the 19th Century gave the city its economic base, heritage, and character that are still prevalent today. Today, the city can be characterized as a highly urbanized community surrounded by wealthier suburban white-collar communities including Billerica, Chelmsford, Dracut, Tewksbury, and Tyngsborough.

As of the 2000 U.S. Census, Lowell was home to 105,167 people, 39,407 of whom were members of minority groups (including White Latinos). Since 1980, Lowell has been experiencing significant growth in our minority populations, the largest and fastest growing of these include Southeast Asians, and Latinos. The following table illustrates these trends, which are expected to continue over the coming five years. Areas of minority concentration are shown on the map below.

Population by Race & Ethnicity

	1980	1990	2000
Total Population	92,418 (100%)	103,439 (100%)	105,167 (100%)
White (%)	88,596 (95.9%)	84,048 (81.3%)	72,145 (68.6%)
Black (%)	1,205 (1.3%)	2,293 (2.2%)	4,423 (4.2%)
Asian (%)	604 (0.7%)	11,549 (11.2%)	17,371 (16.5%)
Other (%)	2,013 (2.2%)	5,568 (5.4%)	11,228 (10.7%)
Latino (%)*	4,585 (5.0%)	10,089 (9.8%)	14,734 (14.0%)

*May be of any race.

Source: U.S. Census Bureau

Minority Concentration by Census Block Groups

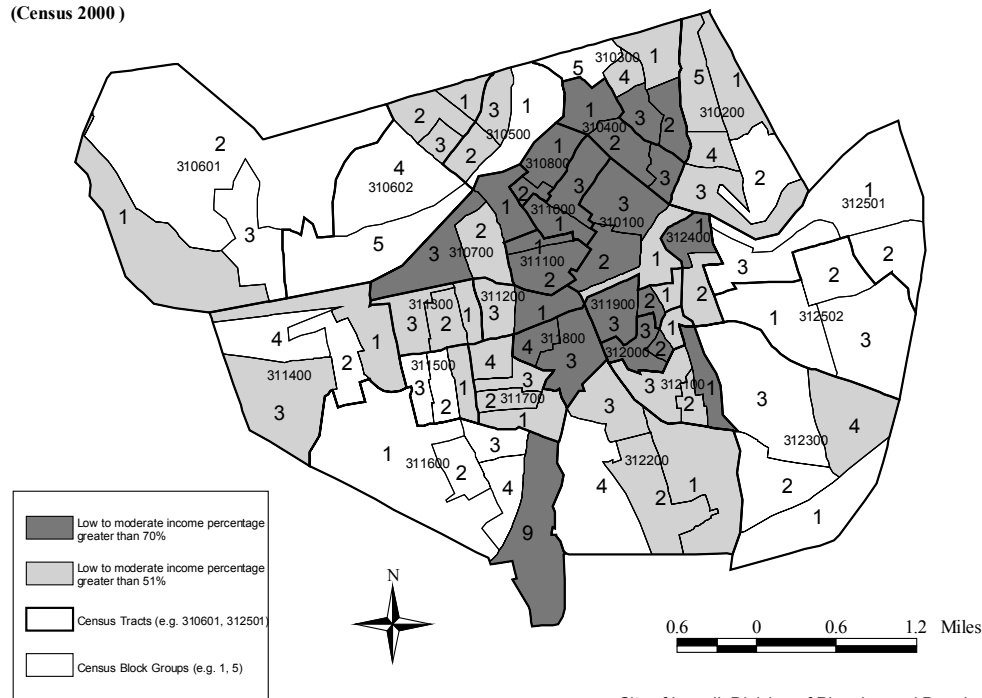
(Census 2000)



As of the 2000 U.S. Census, Lowell was home to 58,528 residents who earn less than 80% of the area median income and are therefore classified as low- or moderate-income by HUD. This represents 57.8% of the City-wide population for whom household income could be determined. The following map illustrates the block groups with the heaviest concentrations of low- and moderate-income residents in Lowell. Consolidated Plan funds (except HOPWA) will generally be targeted toward these low- and moderate-income neighborhoods or toward activities that benefit all residents of the city, a majority of whom are low- or moderate-income.

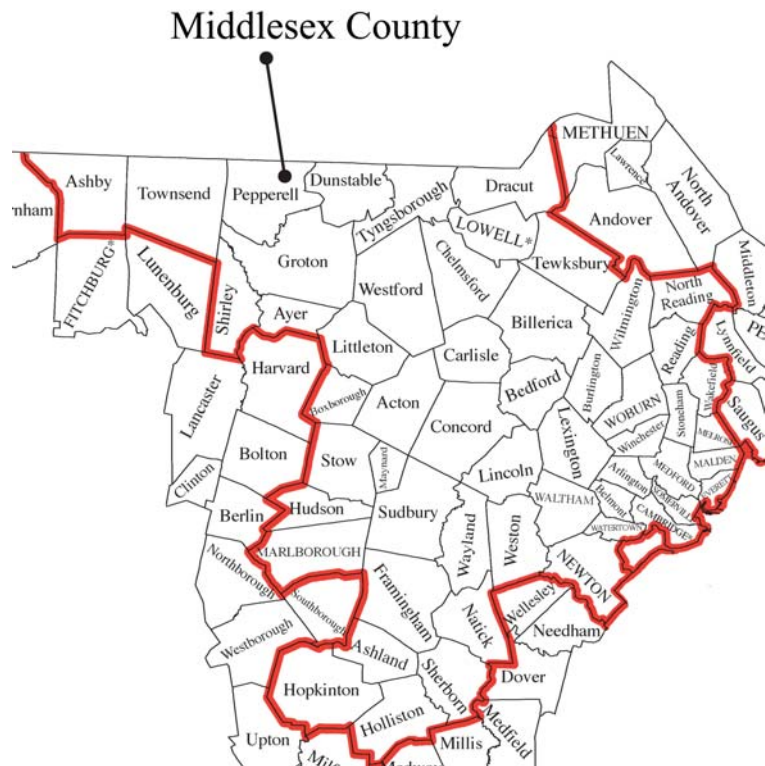
CDBG Priority Areas by Census Block Groups

(Census 2000)



City of Lowell, Division of Planning and Development

Because Lowell is the largest City in Middlesex County, MA, it is also an entitlement community for the HOPWA program. This block grant is designated to serve persons throughout Middlesex County who are living with HIV/AIDS and their families. For this program, funds will be allocated to eligible recipients county-wide whose programs serve this population. It is anticipated that the funds will be targeted to organizations whose service areas include the urban centers within the County, including Lowell, Cambridge, Somerville, and Marlborough, where the greatest percentage of persons with HIV/AIDS reside.



2. BASIS FOR ALLOCATION OF FUNDING

GEOGRAPHIC ALLOCATION

Because the primary national objectives of the Consolidated Plan programs are to benefit low- and moderate-income residents, Lowell's block grant program funds will be targeted to low- and moderate-income neighborhoods and activities that benefit the City as a whole, the majority of whose residents are low- or moderate-income. The maps above illustrate these areas.

PRIORITY NEEDS

Guided by the eligibility requirements of the various Consolidated Plan programs, the City of Lowell recognizes the following priority need categories for the five-year planning period. Relative priorities and target funding proportions were established through the synthesis of the needs information obtained through the plan development process described elsewhere in this document. A core component of the public outreach in preparing this plan was to prioritize among a lengthy list of real needs given the limited amount of funding available through the Consolidated Plan programs.

	Priority
GOAL A: HOMELESS/HIV/AIDS	
Objectives:	
1. Increase the number of homeless persons moving into permanent housing	HIGH
2. End chronic homelessness	HIGH
3. Provide housing and supportive services for persons with HIV/AIDS and their families	HIGH
GOAL B: NONHOMELESS SPECIAL NEEDS	
Objectives:	
1. Increase range of housing options and related services for persons with special needs	MEDIUM
GOAL C: RENTAL HOUSING	
Objectives:	
1. Increase the supply of affordable rental housing (particularly for households earning 50% of AMI or less)	HIGH
2. Improve the quality of affordable rental housing	HIGH
3. Improve access to affordable rental housing	MEDIUM
4. Improve access to affordable rental housing for minorities	MEDIUM
GOAL D: OWNER-OCCUPIED HOUSING	
Objectives:	
1. Increase the availability of affordable owner housing	HIGH
2. Improve the quality of owner housing	HIGH
3. Improve access to affordable owner housing	HIGH
4. Improve access to affordable owner housing for minorities	HIGH
GOAL E: PUBLIC FACILITIES	
Objectives:	
1. Improve quality/increase quantity of neighborhood facilities serving LMI persons	HIGH
2. Improve quality/increase quantity of facilities that benefit LMI teens and youth	HIGH
3. Improve quality/increase quantity of facilities that benefit seniors and the elderly	HIGH
GOAL F: INFRASTRUCTURE	
Objectives:	

1. Improve quality/increase quantity of public improvements that benefit LMI persons	HIGH
GOAL G: ECONOMIC DEVELOPMENT	
Objectives:	
1. Improve economic opportunities for LMI persons	HIGH
2. Support the implementation of the JAM Urban Renewal Plan	HIGH
3. Remediate and redevelop brownfields	HIGH
GOAL H: PUBLIC SERVICES	
Objectives:	
1. Improve services for LMI persons	HIGH
2. Improve services for LMI youth and teens	HIGH
3. Improve services for seniors and the elderly	HIGH
4. Improve services for disabled adults	MEDIUM

OBSTACLES TO MEETING UNDERSERVED NEEDS

The primary obstacle to meeting all of the identified needs, including those identified as priorities, is the general lack of funding resources available to the public and private agencies who serve the needs of low- and moderate-income residents. In recent years, the Commonwealth of Massachusetts has reduced funding for local aid to cities and towns, housing, community development, social services, education, homeless services, economic development, recreation, and public health programs in an attempt to counter the effects of stagnant tax collections, escalating health insurance obligations, and rising costs of service delivery. Many private foundations who have historically aided municipalities and not-for-profit organizations dedicated to addressing Consolidated Plan needs have seen their endowments substantially reduced by declines in the stock market since 2000. As a result the major foundations serving the Lowell area have all reduced their giving in recent years. The City of Lowell's municipal budget has been stretched to overcome the substantial reduction in local aid from the Commonwealth of Massachusetts since 2002 coupled with increasing health insurance and service delivery costs, resulting in layoffs and reductions of all department budgets, leaving little room for expansion of community development funding at the local level. Finally, the City of Lowell's Consolidated Plan entitlement grants have not kept up with inflation and in many cases have been reduced, further limiting the funds available to address the needs in the community.

City of Lowell Consolidated Plan Resources FY01-FY06

City Fiscal Year	CDBG	HOME	ESG	Total	% Change	Boston CPI Change
2001-02	\$2,934,000	\$1,252,000	\$100,000	\$4,286,000	-	-
2002-03	\$2,874,000	\$1,253,000	\$100,000	\$4,227,000	-1.38%	1.87%
2003-04	\$2,831,000	\$1,222,590	\$98,000	\$4,151,590	-1.78%	3.73%
2004-05	\$2,815,000	\$1,215,372	\$103,556	\$4,133,928	-0.43%	2.91%
2005-06	\$2,678,834	\$1,171,666	\$102,962	\$3,953,462	-4.37%	N/A

Source: HUD, Federal Reserve Bank of Boston

Managing the Process (91.200 (b))

1. *Lead Agency. Identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.*
2. *Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.*
3. *Describe the jurisdiction's consultations with housing, social service agencies, and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.*

**Note: HOPWA grantees must consult broadly to develop a metropolitan-wide strategy and other jurisdictions must assist in the preparation of the HOPWA submission.*

3-5 Year Strategic Plan Managing the Process response:

1. LEAD AGENCY

As the entitlement grantee for the CDBG, HOME, ESG, ADDI, and HOPWA programs, the City of Lowell Division of Planning and Development (DPD) is the lead agency for the development of this five-year consolidated plan as well as the annual action plans that outline the proposed activities and expenditures under these programs. The DPD will also act as one of several public and private agencies that will administer programs and activities under the plan. The DPD oversees planning, economic development, community development, housing, lead paint abatement, Historic Board, and urban renewal programs. Other major agencies and organizations that will administer programs include:

City of Lowell

Council on Aging	Parking Department
Fire Department	Department of Parks and Recreation
Health Department	Police Department
Hunger/Homeless Commission	Department of Public Works
Information Technology Department	Wastewater Utility
Inspectional Services Department	Water Utility
Division of Neighborhood Services	

Other Public Organizations

City of Cambridge	Town of Framingham
Lowell Housing Authority	University of Massachusetts – Lowell
Middlesex Community College	Umass Lowell Research Foundation

Private Organizations and Agencies

Acre Family Day Care Center	Lowell Parks & Conservation Trust, Inc.
AIDS Action Committee	Lowell Transitional Living Center, Inc.
AIDS Housing Corporation	Mass Alliance of Portuguese Speakers
Alternative House	Mental Health Assoc of Greater Lowell
Angkor Dance Group	Merrimack Valley Catholic Charities
Asian Task Force Against Domestic Violence	Merrimack Valley Food Bank, Inc.

Big Brother/Big Sister	Merrimack Valley Housing Partnership
Boys & Girls Club of Greater Lowell, Inc.	Metropolitan Boston Housing Partnership
Cambodian American League of Lowell	Open Pantry of Greater Lowell Inc.
Cambodian Mutual Assistance Association	Rape Crisis Services of Greater Lowell
Cambridge Cares About AIDS	Recruitment Resources Consulting
Central Food Ministry, Inc.	Retarded Adult Rehab Assoc.
Christmas in April Lowell	Salvation Army
Coalition for a Better Acre	Southern Middlesex Opportunity Council
Community Teamwork, Inc	Spindle City Corps
Concord Family & Youth Services	St. Julie Asian Center
D'Youville Senior Care Center, Inc.	Suitability
Girls, Inc.	The Community Family, Inc.
House of Hope Inc.	Tri-City Community Action Program
Justice Resource Institute	United Teen Equality Center (UTEC)
Lao Family Mutual Association of Lowell, Inc.	West End GYM Inc.
LifeLinks	YMCA
Lowell Association for the Blind, Inc	YWCA
Lowell Community Health Center	

2. PLAN DEVELOPMENT PROCESS

The City of Lowell has embraced a process for the development of this five-year consolidated plan that included broad participation from the community. This process began with the City's Comprehensive Master Plan which was adopted in 2003 and has continued through the preparation of this document and will remain in effect throughout the upcoming five year period through the Citizen Participation Process outlined below. At each step in the process care has been taken to insure that low- and moderate-income residents, members of minority groups, agencies involved in the provision of services to these populations, and others who are directly impacted by the programs and projects supported by the Consolidated Plan programs have been actively involved.

MASTER PLAN PUBLIC OPINION RESEARCH

This five-year Consolidated Plan is grounded in part on the extensive public participation that was conducted in support of the 2002-2003 Master Plan process. That outreach effort included a 1001 household telephone survey conducted in five languages with careful scientific sampling techniques used to ensure proportional representation among various minority, geographic, age, and income groupings. The survey reached 273 households earning below \$30,000 annually and 233 households earning between \$30,000 and \$49,999 annually. The Master Plan outreach effort also included an extensive telephone survey of businesses, several resident focus groups, and interviews with 60 community leaders.

The questions asked in the household survey included a number which were designed to obtain input on resident's priorities for their community along with a corresponding evaluation of how the City of Lowell was performing in these areas.

The table below summarizes the opinions of the low- and moderate-income residents who were surveyed. The importance and performance indexes rate survey responses scaled based on an average score of 100. The gap represents the difference between the value that residents place on a particular issue and their assessment of the Lowell's performance in addressing that issue.

The issues of greatest importance to low- and moderate-income residents included public safety, cost of living, housing, job opportunities, and neighborhood quality of life. Among these, the issues where the low- and moderate-income residents feel the City should be doing more include creating jobs, maintaining reasonable property taxes, developing housing, and reducing drug activity. Other issues where low- and moderate-income residents identified a large gap between the City's performance and the issue's importance include parking, conditions of streets and sidewalks, traffic and traffic calming, pedestrian and bicycle amenities, retail opportunities, and water quality.

Low- and Moderate-Income Residents' Importance vs. Performance Ratings

Community Characteristics	Importance Index	Performance Index	Gap
Lots of job opportunities for me in the city	101	52	-49
Reasonable property taxes	106	58	-48
Good selection of housing that I can afford	102	60	-42
No noticeable drug activity	121	89	-32
Enough parking	94	63	-31
Well-maintained roads and sidewalks	94	74	-20
Traffic that moves freely through town	94	77	-17
Convenient pathways for pedestrians and bicyclists	94	78	-16
Downtown restaurants and cafes open later in the evening	88	72	-16
A good variety of stores downtown	88	74	-14
Good quality drinking water	103	91	-12
Streets and walkways are well designed	94	83	-11
Residential housing is well- maintained	102	95	-7
A clean and attractive city	102	103	1
Good public schools	113	115	2
A place where I feel safe	121	128	7
Everyone is treated fairly by city officials	90	97	7
English classes offered at convenient times and places	90	98	8
Residents are well informed about the city	97	105	8
A police presence in my neighborhood	121	129	8
Neighbors who get along well	102	110	8
Good snow removal	97	108	11
Lots of positive activities for children and teens	82	94	12
Not feeling crowded in my neighborhood	102	116	14
Good public transportation	94	113	19
Parks and recreational areas that meet my needs	82	107	25
Stores in my neighborhood that meet my basic shopping needs	88	117	29
Good recycling program	97	128	31
Plenty of cultural activities	82	129	47
A city that preserves its historic places	102	156	54
Good trash removal	97	155	58

Source: Davidson Peterson Associates, Lowell Resident Sentiment Report, 2002

The survey also presented specific practical tradeoffs between often competing priorities and asked respondents to express their preference. The responses given by low- and moderate-income residents are outlined below. Overall these responses reflect clear interests in core economic and cost-of-living issues and in protecting and enhancing the quality of life in their neighborhoods.

Low- and Moderate-Income Residents' Preferences for Competing Priorities

Make the City look better, but charge more taxes.	33%
Keep the city the way it is, without higher taxes.	62%
Make the city easier to drive-widen roads and remove stop signs.	19%
Slow speeds to protect people and quiet neighborhoods.	77%
Make houses cheaper by building more, but with more density.	55%
Create space by removing buildings, causing housing costs to increase.	37%
Make the area nicer by improving the downtown and gateways	36%
Locate your home in a nicer area by improving neighborhoods.	63%
More equipment for parks such as swing sets.	39%
More athletic courts such as basketball and volleyball.	34%
More open space for conversation or passive parks.	24%
Regulate construction to protect historic character.	60%
Promote construction with fewer restrictions.	35%
Create jobs by brining in development city-wide	51%
Protect residents by limiting development nearby	50%
Promote as a desirable place in Greater Boston	26%
Promote as a unique city apart from Boston	71%
Protect quality of life by enforcing housing codes	60%
Protect private property rights of owners	36%

Source: Davidson Peterson Associates, Lowell Resident Sentiment Report, 2002

Interestingly, the survey also noted two clear and distinct clusters of public opinion among the low- and moderate-income residents, out of five identified city-wide. Each group was formed based on similarity of views across the survey. However, the two groups expressed some significant differences of opinion from one another. The two segments dominated by low- and moderate-income residents were given the descriptive names: "Diverse Blue-Collar Families" and "Upwardly Mobile Inner-City Residents." Key segment descriptors and specific findings associated with each group are outlined below.

Diverse Blue-Collar Families	<ul style="list-style-type: none"> • Least likely to have lived in Lowell entire life • Least likely to live in "upscale" neighborhoods • Least likely to live in single family home • Most likely to live in apartment or duplex • Most likely to rent • Largest households • Most likely to have children • Most likely to have children enrolled in Lowell public schools • Least likely to be Caucasian • Most likely to be Asian or Hispanic • Most likely to be employed in a blue collar job • Least likely to have gone to college • Most likely to have income less than \$30k • Most likely not to know what neighborhood they live in
---	--

When reviewing Lowell's performance across a number of areas, Diverse Blue-Collar Families hold some differing views from the population at large:

- More Diverse Blue-Collar Families rate Lowell lower on *Plenty of cultural events* and *Plenty of public events and festivals* than do the other resident segments. As many in this group are of Asian descent, they may feel that there is a need for more Asian-specific activities.
- More of this group rate Lowell lower on *Good recycling program* than do other segments.
- Diverse Blue Collar Families are less likely to feel that Lowell's parks meet their needs. However, this group is the least likely to want *More open space for passive parks*. They are looking more for sporting fields or equipment tailored to their recreation choices.

When comparing attribute importance to Lowell performance on those issues, we see some differences by segment in key "poor performance areas" and "good performance areas." Diverse Blue-Collar Families in general have smaller gaps than other segments, indicating that overall Lowell's performance is more in line with their expectations. This segment does, however, feel that the City should be doing better on the key issues of drug activity, affordable housing, jobs, and general safety issues.

While most residents do not believe that promoting Lowell as a tourist destination benefits them greatly (80%), Diverse Blue-Collar Families are most likely to see tourism as a benefit to the City. However, even a majority of these households (61%) do not see tourism as a great advantage. This segment appears to be more positive towards any economic development activity that can bring additional jobs.

Because they want more affordable housing, unlike other segments, almost two-thirds of Diverse Blue Collar Families would accept increased density to lower housing costs.

Finally, as this segment is the most likely to be populated with people of color, they are also the most likely to be accepting of future immigrants. However, even a majority of this segment (64%) no longer want Lowell to welcome immigrants.

**Upwardly Mobile
Inner-City
Residents**

- Least likely to be new comers to Lowell
- Most likely to live in “more urban” neighborhoods
- More likely to rent
- Directionally more Hispanics
- Youngest group
- Less likely to be a college graduate or to have high income
- Higher income/education than segment 1
- Less likely to work in blue collar job than segment 1

In terms of Lowell’s performance,

- Most Upwardly Mobile Inner-City Residents seem to be concerned that Lowell is doing a poor job of controlling drug activity
- They are also more likely to feel crowded than other residents.
- They are also more likely to feel that.
- Upwardly Mobile Inner-City residents are less likely to feel that Lowell provides an adequate supply of quality housing that they can afford.
- This segment is more likely to rate Lowell low on *A place where I feel safe*, and *Neighbors who get along*, than are other segments.

When comparing attribute importance to Lowell’s performance, Upwardly Mobile Inner-City Residents believe that Lowell should be performing much better on *Police and Safety* issues, and specifically with curbing drug activity in their neighborhoods. Most feel the City performs well on its recreational activities and waste disposal.

While Upwardly Mobile Inner-City Residents share the desire of Diverse Blue Collar Families for more affordable housing, they are not resolute in their acceptance of increased density as a solution. While almost two-thirds of their inner-city neighbors would accept increased density to lower housing costs, significantly fewer Upwardly Mobile Inner-City Residents would choose that result. They are just as likely to be split on the issue as the other segments.

However, they clearly want improvements at the neighborhood level. While 60% of residents would prefer the City to focus improvements at the neighborhood level than in the downtown/gateways, this is even more likely to be true of Upwardly Mobile Inner-City Residents.

ECONOMIC DEVELOPMENT FOCUS GROUPS

Two focus groups were held to discuss economic development issues in support of this Consolidated Plan. The events were held on January 5 & 10, 2005 at the Lowell Senior Center. Each group included invitees who represent the diverse interests associated with economic development opportunities for low- and moderate-income residents. The purpose of these groups was to identify priority needs and define conceptual strategies for addressing those needs utilizing the resources of the CDBG program to assist with this effort. Particular attention was paid to the creation of job and entrepreneurship opportunities for low- and moderate-income and minority residents. The groups were organized by City of Lowell Economic Development staff. Invitees included representatives from the following groups, organizations, or constituencies (those marked with a "*" attended one of the events).

Organizations, Groups, and Constituencies Represented

Acre Plan CAC	Lowell Small Business Assistance Center*
African Assistance Center	Massachusetts Office of Business Development
Cambodian Mutual Assistance Association*	Merrimack Valley Convention and Visitors Bureau*
Career Center of Lowell*	Middlesex Community College
Center City Committee*	Northern Middlesex Council of Governments*
Cultural Organization of Lowell*	Saints Memorial Medical Center*
Downtown Lowell Business Association	University of Massachusetts Lowell*
Greater Lowell Chamber of Commerce	Workforce Investment Board
JAM Plan CAC*	
Lowell Adult Education*	Business Owners*
Lowell General Hospital*	Cultural Leaders*
Lowell High School	Environmental Corporations*
Lowell National Historical Park	Property Managers*
Lowell Plan/Lowell Dev. & Finance Corp.	Real Estate Professionals*
Lowell Regional Transit Authority	Residents*

Each group was given a brief introduction to the consolidated plan and CDBG past spending as it relates to Economic Development activities, eligible activities, and current Lowell economic indicators. The group was then engaged in a discussion, based on the following three questions:

- What are the most serious obstacles to people in Lowell getting good paying jobs?
- What are the greatest economic development needs facing Lowell today?
- How can addressing these needs help persons of low-moderate incomes?

As the discussion progressed based on these questions, Economic Development staff developed a list for both obstacles and needs. This list was in front of the group at all times to further discussion and for the final exercise of the meeting, prioritization of needs.

In this exercise, each member of the group was given a survey. The survey allowed for each member to list what they believed was the top five needs in terms of economic development that would assist persons of low-moderate incomes. They were then told to prioritize these needs, as if they had a total of \$100,000 to spend on the top five needs. The results are compiled in the table following. The table includes totals for funding for each need, and the number of times affirmed – or times mentioned on the survey, and percentages of totals. While some categories are very specific and may fit into a larger category, Economic Development staff attempted to limit consolidation of very specific issues when tabulating surveys.

Both groups touched on much of the same issues. Common themes included more assistance for minority owned businesses, business recruitment & marketing, workforce development, job training, small business & entrepreneurship development, arts & culture development, industrial/commercial development, Tanner Street Initiative/green technologies & urban renewal plans.

The highest scoring need on the survey, youth skills training, was clearly more of a discussion point in one group. While both groups noted the need and current issue with the numbers of unemployed and underemployed youth, and need for appropriate skills and life skills training of such in earlier life stages, the January 5th group prioritized this far higher than the January 10th group. Many in the January 5th group suggested a Youth Center, like the Senior Center, is a much needed facility in Lowell that could translate into an important workforce development aspect of the future of Lowell's economy. In fact, the January 5th group is responsible for all \$210,000 worth of prioritized "funding" attributed in the survey.

There was a clear mandate for the development of both ethnic businesses as well as additional support for minority-owned businesses. Many respondents believed this could be a segment that could not only produce jobs that are attainable for those of low-moderate incomes but that the ethnic business side could also serve as a positive marketing tool. There was also much discussion about fostering entrepreneurship and small business development rather than larger employers, items that would tend to support more of an emphasis on the Lowell Small Business Assistance Center.

There were strong feelings in regards to life skills and language skills, in that they don't always match up with the needs of good paying job openings in Lowell. These skills, apart of actual job skills, are disenfranchising potential employees prior to job openings even existing. Some attendees thought we should do more to encourage the service industry, as the positions in this industry would be more appropriate for low/moderate income candidates that might have issues with life and language skills.

Respondents were well aware of investment that had been made previously in downtown in terms of the Downtown Venture Fund and infrastructure and street furniture improvements, but most agreed that this investment must always continue for Lowell's tourism, arts, retail, and restaurant trades to continue to grow, and for the ongoing success of downtown residential projects.

Below is a summary of funding and prioritization of needs, based on survey responses from both groups:

Needs	Funding Allocated	%	Times Affirmed	%
Youth skills training/development	\$210,000.00	11.11	9	9.09
Job Training/workforce development	\$195,000.00	10.32	9	9.09
Minority-owned business development	\$190,000.00	10.05	10	10.10
Business recruiting and retention	\$182,500.00	9.66	9	9.09
ESL/Life Skills	\$165,000.00	8.73	7	7.07
Entrepreneurship	\$155,000.00	8.20	9	9.09
Downtown development	\$110,000.00	5.82	5	5.05
Commercial/Industrial development	\$90,000.00	4.76	3	3.03
Marketing	\$85,000.00	4.50	4	4.04
Partnership building	\$65,000.00	3.44	4	4.04
Arts & Culture development	\$60,000.00	3.17	5	5.05
Tanner Street Initiative/green technologies	\$60,000.00	3.17	4	4.04
Urban Renewal plans	\$55,000.00	2.91	4	4.04
Higher Education partnerships	\$37,500.00	1.98	3	3.03
Gateway improvements & signage	\$35,000.00	1.85	3	3.03
Develop service industry	\$30,000.00	1.59	2	2.02
Mill building and riverfront development	\$25,000.00	1.32	2	2.02
New downtown business association	\$25,000.00	1.32	1	1.01
Niche manufacturing	\$25,000.00	1.32	1	1.01
Child care	\$20,000.00	1.06	1	1.01
Economic research	\$20,000.00	1.06	1	1.01
Infrastructure	\$20,000.00	1.06	1	1.01
Innovative transit	\$20,000.00	1.06	1	1.01
Specialized job training	\$10,000.00	0.53	1	1.01
Total	\$1,890,000.00	100.00	99	100.00

NEIGHBORHOOD FOCUS GROUPS

Three focus group discussions were held to address issues of neighborhood stabilization associated with this Consolidated Plan. Each of the three events focused on a cluster of low- and moderate-income neighborhoods in the City, included representative invitees from those areas, and was held at a public facility in one of the neighborhoods being discussed. Each event included a review of recent Consolidated Plan program activities in the area and a discussion of the purposes of the programs. This introduction was followed by an exercise and discussion designed to allow participants to define core neighborhood needs and clearly indicate their priorities for Consolidated Plan projects in their area in the years covered by this plan. These events explored public facilities, infrastructure, housing, economic development and public service activities as they relate to meeting neighborhood needs.

The three events were held in locations geographically accessible to residents of Lowell's low- and moderate-income neighborhoods as follows:

Centralville/Pawtucketville
January 5, 2005 Greenhalge School
Back Central/Sacred Heart/South Lowell/Lower Belvidere
January 12, 2005 Butler School
Lower Highlands/Acre
January 19, 2005, Lowell Senior Center

Invitees included the following individuals (those marked with a "*" attended an event). Several additional individuals attended sessions as well.

African Assistance Center	John Keratsopoulos (Business Owner)
Archie Kenefick Tenants Council	Jack Knox (Resident)
Bany Restaurant (Business)	Dina Koch (Resident)
Belvidere House of Pizza (Business)	Bernie Lemoine (Resident)
Bishop Markham Village Tenants Council	Dick Lockhart (Neighborhood Activist)
Walter Borges (Neighborhood Activist)*	Mary MacGregor (Resident)
Coalition for a Better Acre	Henry Marchand (Resident)
Cote's Market (Business)	Mass. Alliance of Portuguese Speakers
Leo Dalphonde (Business Owner)	Carol McCarthy (Neighborhood Activist)*
Peter Dayle (Business Owner)	Darius Mitchell (Resident)
Fr. Morrisette Tenants Council	North Canal Tenants
Father Norton Manor Tenants Council	North Common Tenants
Robert Finch (Resident)	Anne Page (Neighborhood Activist)
Francis Gatehouse Tenants*	Barbara Palermo (Neighborhood Activist)
Gagnon Hardware (Business)	Palin Plaza (Business)
Conrad Gauthier (Neighborhood Activist)*	Elaine Pantano (Neighborhood Activist)*
George Flanagan Tenants	Jose Perregil (Resident)*
Jane Ginsburg (Neighborhood Activist)*	Tarsy Poulios (Resident)
Glory Buddhist Temple	Santoro's (Business)
Brenda Griffiths (Neighborhood Activist)	United Teen Equality Center
Ed Haddad (Neighborhood Activist)*	Mario Veiga (Business Owner)
Roberta Jaeger (Business Owner)	

There was a general consensus among the participants in all three meetings that conditions in the neighborhoods overall are improving. The CDBG-funded Moulton Square/Monsignor Keenan Park project in Centralville was held up as a particularly strong example of a successful neighborhood improvement project on multiple fronts. Concerns remain however, particularly around issues of traffic and roadways, sidewalks and pedestrian safety, crime prevention, code enforcement, parking supply, and green space/parks. Several other issues were also discussed but did not garner as much support as priority issues for the neighborhoods.

HUMAN SERVICES SURVEYS

A written survey was prepared and distributed to all agencies and organizations involved in the delivery of human and public services to low- and moderate income, minority, and special needs populations in Lowell who received Consolidated Plan funds in recent years, along with several other organizations. The survey was distributed to the organizations' directors and included questions for the staff as well as a short survey for them to administer to a sample of their clients. The surveys were designed to define the most significant needs among the target populations to be served by the Consolidated Plan programs including housing, employment, public facilities, and neighborhood stabilization along with human services. The survey instrument also asked respondents to highlight existing activities, programs, and organizations which have proven particularly effective at meeting core needs. More than 200 clients and 21 organizations participated in the survey.

The client responses identified assistance with rent and mortgage payments as their top need, followed closely by assistance with job skills and finding employment, utility assistance, and transportation assistance, all of which were cited by 29% or more of the respondents. The potential needs that were only identified as high priorities by ten percent or fewer of those surveyed included emergency shelters, English-language training, in home medical care, proscriptio assistance, and health care.

A second survey was distributed to 50 representatives of human service and education providers in the community. That survey presented the 2000-2004 spending levels among various public service constituencies and asked respondents to recommend adjustments to the proportions of future expenditures. The response generally recommended that funding remain consistent with past years with a few notable exceptions. Respondents felt that youth services and homeless services should be increased while job training (as a public service activity) and housing support services should be proportionally reduced.

HOUSING NEEDS SURVEY

A written survey was prepared and distributed to 14 agencies and organizations interested in being certified as Community Housing Development Organizations (CHDOs). The survey was distributed to the organizations' executive directors and included questions for the staff as well as a short survey for them to administer to all members of their boards of directors. The survey was designed to identify and prioritize needs related to affordable housing in the City. Attention was paid to core housing issues, but also to issues of education and employment which may impact families' abilities to retain decent affordable housing.

The surveys were distributed to the following organizations (those marked with a "*" submitted a response).

Housing Providers Surveyed	
Alternative House*	House of Hope
Cambodian American League of Lowell	Lowell House, Inc.
Cambodian Mutual Assistance Association	Lowell Transitional Living Center
Catholic Charities*	Merrimack Valley Housing Partnership
Coalition for a Better Acre*	Pathfinder
Community Teamwork, Inc.	Residents First Development Corporation*
GRIP Project	United Teen Equality Center

Although the sample size of completed surveys was extremely small, some of the findings are nevertheless relevant. Executive directors who responded noted the need for the production of permanent affordable units (both rental and owner-occupied) as a top priority. Emergency assistance for tenant rental and utility expenses, housing search assistance, and employment opportunities were also noted. Directors identified various subsidy programs, section 8 certificates, access to transportation, child care, and employment, advocacy and case management, as well as the institutional partnership structure in Lowell as key resources for helping clients meet their housing needs.

Twelve total board members, who certified themselves as either low-income or residents of low-income neighborhoods, completed surveys. Several respondents noted a general need for affordable housing and one or more respondents noted nearly every potential factor or need as a priority. However, the most commonly-cited housing need was "creating job opportunities to enable people to afford housing." Respondents noted Community Teamwork, Inc., the Coalition for a Better Acre, the Salvation Army, Alternative House, Catholic Charities, and the City of Lowell Division of Planning and Development as some of the organizations that had provided the most significant assistance in meeting their housing needs.

HUNGER/HOMELESS COMMISSION

Outreach was conducted at the February 2, 2005 monthly meeting of the Lowell Hunger-Homeless Commission to help identify and prioritize core needs in the community and recommend strategies for addressing these with assistance from the Consolidated Plan programs.

Commission members clearly identified housing affordability and the condition of available housing as the top concerns among their client populations. Recommendations for actions to remedy these conditions included the construction of additional subsidized housing, expansion of section 8 and other rental assistance programs by the state and federal governments, increased funding for rental housing code compliance inspections by the City of Lowell Health Department, and basic life skills training for low-income and very-low income residents. Some participants did express concern for the costs of producing new affordable housing and how expenditures on this priority might negatively impact other programs, whose funding might be reduced while only generating a small number of new units.

Other issues that were identified as priority needs included employment related issues, emergency food pantries, substance abuse and mental health treatment (especially long-term and residential programs), assistance for the "near-elderly" who do not qualify for social security and other programs designed to assist those aged 65 and older, and assistance for teen parents.

HOPWA FOCUS GROUPS

As a new entitlement community for the HOPWA program, Lowell utilized technical assistance funds to engage the AIDS Housing Corporation (AHC), a Boston-based non-profit with extensive experience with HOPWA, to assist in assessing needs throughout Middlesex County. In addition to analyzing epidemiological data for the jurisdiction, AHC organized two focus groups of providers and clients on January 7, 2005. One was held in Lowell, the second in Cambridge, MA. The focus groups discussed what housing resources exist in Middlesex County for persons with AIDS, what barriers limit access to these resources, and what additional resources may be needed that do not currently exist. Participants included:

AIDS Housing Corporation	Lowell Continuum of Care
Cambridge Cares About AIDS	Lowell House
Cambridge YMCA	Mass. Dept. of Public Health AIDS Bureau
Catholic Charities	St. Julie Asian Center
City of Lowell Division of Planning and Development	Tri-City Community Action Program
Greater Lowell AIDS Consortium	

In both focus groups, participants lauded the coordination and cooperation among agencies as a key to the successes of efforts to assist people with AIDS address housing-related issues. Members of each group also cited various programs that were valuable in helping clients find and keep housing, including utility and rental assistance programs, homelessness prevention efforts, advocacy and supportive services, legal assistance, and medical care.

In addition to broad concerns about housing affordability and the lack of resources devoted to support for persons with AIDS, participants raised three key issues as the primary impediments to addressing the housing needs of persons with AIDS. First, the lack of available section 8 and similar rental vouchers has stalled the continuums of care throughout Middlesex County because people who are prepared to move out of transitional housing programs cannot obtain vouchers and therefore spaces are not available in the transitional programs for new clients.

Second, in part due to the severe shortage of rental vouchers and affordable housing units available, providers, landlords, and others have become more aggressive and restrictive with respect to criminal histories of clients. Those with criminal histories have been consistently more difficult to place in housing. In the case of many formerly homeless HOPWA clients, the "criminal background" may be an arrest for public urination or a similar offense associated with being homeless. This charge in particular is problematic because public urination is officially recorded as public indecency which is defined as a sex offense.

Finally, there is a great need for programs and assistance that will identify those clients who are in danger of becoming homeless and provide short-term or one-time assistance to prevent evictions or utility shut-offs, etc. that may lead to homelessness and a far greater cost burden to public and non-profit social service agencies.

PUBLIC HEARINGS & COMMENT PERIODS

In addition to the targeted data collection and public participation efforts outlined above, the City of Lowell DPD and the Consolidated Plan CAC has conducted two open advertised public hearings and provided an advertised public comment period to obtain feedback and solicit input into this Consolidated Plan. The first was held at the Lowell Senior Center on January 13, 2005. This hearing included an introduction and explanation of the Consolidated Plan's purpose and the process and schedule for its completion as well as an opportunity for interested persons to comment on past activities of the Consolidated Plan programs, identify needs, and propose strategies for addressing those needs.

Minimal public comment was received at this hearing. Discussion focused primarily on concerns about reduced program funding overall. Questions were also raised about particular rating criteria for the distribution of funding to subrecipients and the program evaluation process.

A public hearing was also held on February 17, 2005 at the Lowell Senior Center regarding project selection for the 2005-2006 program year. A separate public hearing was held on February 23, 2005 at the Lowell Senior Center to discuss the update to Lowell's Analysis of Impediments to Fair Housing. Both of these hearings

noted the ongoing five-year consolidated planning process but did not focus on the five-year plan.

A draft of the Consolidated Plan was prepared in March 2005 and made available for public review and comment from March 28, 2005 through April 29, 2005. A summary of comments received and the City's responses is included elsewhere in this document.

The second hearing was held on April 7, 2005 at the Lowell Senior Center. This hearing was scheduled to allow interested parties a week to review the draft document prior to being afforded an opportunity to present testimony on that document. This input has been used to refine the document prior to publication of the final draft.

Findings...

3. CONSULTATIONS

In developing this five-year Consolidated Plan, the Division of Planning and Development (DPD), acting as the lead plan development agency, has consulted with representatives from more than 100 agencies, groups, and organizations involved in the development of affordable housing, creation of job opportunities for low- and moderate-income residents, and/or provision of services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. In addition to the surveys, focus groups, hearings, and other outreach efforts described above, DPD officials have met with representatives, staff, and members of the Lowell Housing Authority, the Continuum of Care, and the Disabilities Commission, during January and February of 2005.

Citizen Participation (91.200 (b))

- 1. Provide a summary of the citizen participation process.*
- 2. Provide a summary of citizen comments or views on the plan.*
- 3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.*
- 4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.*

**Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.*

3-5 Year Strategic Plan Citizen Participation response:

1. CITIZEN PARTICIPATION PLAN

As required by the Department of Housing and Urban Development (HUD) Rules and Regulations, the City of Lowell complies with regulation 24 CFR 91.105, Citizen Participation Plan for local governments as outlined. The City has adopted a citizen's participation plan that sets forth the City's policies and procedures for citizen participation.

Citizen and community participation in the process of developing this Five-Year Consolidated Plan has been outlined in the discussion of the plan development process above.

ENCOURAGEMENT OF CITIZEN PARTICIPATION

The City of Lowell will enable citizens of the City to participate in the development of its Consolidated Plan, annual Action Plan, and any substantial amendments to the Consolidated Plan and required Consolidated Annual Performance and Evaluation Report (CAPER). The City will encourage participation by low and moderate-income persons, particularly those living in slum and blighted areas of Lowell, as defined by HUD, and in areas where CDBG funds are proposed to be used. Although a majority of residents throughout the City of Lowell are classified as low or moderate income by the Department of Housing and Urban Development as of the 2000 Census, particular efforts will be made to encourage participation by residents of predominantly low and moderate income neighborhoods, which currently include the following census tracts:

Neighborhood	Census Tract
Acre	3107, 3108, 3110, 3111
Back Central	3119, 3120, 3121
Downtown Lowell	3101
Centralville	3102, 3103, 3104
Highlands	3113, 3114*, 3115*, 3116*
Lower Highlands	3112, 3117, 3118
Lower Belvidere	3124
Pawtucketville	3105, 3106.01*, 3106.02*
South Lowell	3122, 3123*

*(*indicates that only selected block groups in these tracts are classified as having low and moderate income persons, based upon the 2000 Census data.)*

In addition it is expected the City will take steps to encourage the participation of all its citizens, including minorities and non English speaking persons, as well as persons with disabilities. The City will provide translation services for any public meeting or public hearing, if the request for such services is requested four days in advance of the meeting. In addition, all meetings will be conducted in areas that are ADA accessible.

The City will encourage the Lowell Housing Authority (LHA) and their tenants to participate in the process of developing and implementing the City's Consolidated Plan and annual Action Plan, along with other low income residents of targeted revitalization areas in which the developments are located. The City shall provide information to the LHA about the consolidated plan activities related to its developments so that the LHA can make this information available at the annual public hearing required under the Comprehensive Grant Program.

CITIZEN ADVISORY COMMITTEES

Committee Composition

The City Manager shall appoint a Citizen Advisory Committee (CAC) for the Lowell Consolidated Plan development process, consisting of at least seven (7), but not

more than eleven (11) members. All CAC members must be Lowell residents. The majority of the CAC members shall be low and moderate-income persons, and/or residents of blighted or potentially blighted areas, and/or residents of low and moderate-income neighborhoods.

The City Manager shall initially appoint one third of the Members for a three (3) year term; one third of the Members for a two (2) year term; and the remaining Members for a one (1) year term. Upon expiration of the initial term, each subsequent appointment or re-appointment will be for a three (3) year term. The Committee will elect a Chairperson, and a Vice-Chairperson from their membership to conduct Committee business under Robert's Rules of Order.

A HOPWA Advisory Committee shall also be formed with a minimum of five (5) and a maximum of nine (9) members. All members must be residents of Middlesex County, Massachusetts. At least three (3) members shall be appointed by the Lowell City Manager. One member shall be appointed by the Cambridge City Manager and one member shall be appointed by the Framingham Town Manager.

The Lowell City Manager shall initially appoint one third of the Members for a three (3) year term; one third of the Members for a two (2) year term; and the remaining Members for a one (1) year term. Appointments from Cambridge and Framingham shall be for three (3) year terms. Upon expiration of the initial term, each subsequent appointment or re-appointment will be for a three (3) year term. The Committee will elect a Chairperson, and a Vice-Chairperson from their membership to conduct Committee business under Robert's Rules of Order.

Committee Duties and Responsibilities

The CAC shall act in an advisory capacity to the City Manager and shall conduct Public Hearings, Public Meetings, solicit proposals, review all evidence, testimony, and proposals given at the hearings, meetings, or through other methods of communication to formulate and recommend to the City Manager, a spending plan for all discretionary Community Development Block Grant Program (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Shelter Grant Program (ESG) funds available each program year under the City's Consolidated Plan Annual Action Plan.

Funding under these programs that is designated for specific purposes (including multi-year commitments, municipal public facilities projects, and specific targeted areas) in the five-year Consolidated Plan has been reviewed by the CAC as part of the development of this five-year plan, but will not be revisited by the CAC on an annual basis.

The HOPWA Advisory Committee shall act in an advisory capacity to the City Manager and shall conduct Public Hearings, Public Meetings, solicit proposals, review all evidence, testimony, and proposals given at the hearings, meetings, or through other methods of communication to formulate and recommend to the City Manager, a spending plan for all discretionary Housing Opportunities for Persons with AIDS (HOPWA) funds available each program year under the City's Consolidated Plan Annual Action Plan.

CITIZEN PARTICIPATION PLAN REQUIREMENTS

Citizen Input

The City, on an annual basis, through its Citizen Advisory Committee, will make available to citizens, public agencies, and other interested parties, information that includes the amount of assistance the City expects to receive, including specific grant funds, available unspent prior years funds, and related program income. The City will also disclose the range of activities that may be undertaken including the estimated amount that will benefit persons of low and moderate income.

The City will make available to citizens, public agencies, and other interested parties, on an annual basis, the following information through the indicated means:

<u>Information</u>	<u>Source</u>
Amount of assistance	Written notice, public hearing
Range of activities	Written notice, public hearing
Amount to benefit L/M	Written notice, public hearing
Displacement	Public hearing

City's Notification Requirement Regarding Draft Plan Availability

A notification will be advertised a minimum of two (2) times in the local paper to inform the Public that a draft Consolidated Plan, or draft annual Action Plan is available to examine and subject to public comment. The notification will provide a summary of the proposed Consolidated Plan, or annual Action Plan, and describe the contents and purpose of the particular plan. The notice will also be posted on the City's home page (www.lowellma.gov) and on bulletin boards at the locations below. The public notice will state that copies of the particular Plan will be available for review on the City's website and at the following locations for thirty days:

Division of Planning and Development
JFK Civic Center, 2nd Floor
50 Arcand Drive
Lowell, MA 01852

Pollard Memorial Library
385 Merrimack Street
Lowell, MA 01852

Office of the City Clerk
City Hall
375 Merrimack Street
Lowell, MA 01852

Citizen Response Time Frame

The City will make the Plan public, and upon request, format accessible to persons with disabilities. The City will provide the citizens a reasonable opportunity to comment on the Plan, and on any amendments to the Plan as defined by this Citizen Participation Plan.

The City will consider any comments or views of citizens received in writing, or orally, at any of the public hearings, or during the 30-day public review and will address those comments in the preparation of the final consolidated plan or annual

action plan. The City will include any written or oral comments in the final Consolidated Plan or Annual Action Plan submitted to HUD.

The City will also make copies of the draft plan, and Final Plan available to the general public, at no cost on the City's website (www.lowellma.gov). Hard copies will also be available upon request.

AMENDMENTS

The City will amend its approved plan whenever it makes one of the following decisions:

1. To make a change in the goal, priority, or activity of the Consolidated Plan; or
2. To carry out an activity, using funds from any program covered by the Consolidated Plan (including program income), not previously covered in the Action Plan; or
3. To change the purpose, scope, location, or beneficiaries of an activity included in the annual action plan.

All amendments must be authorized by the City Manager, or his designee, and submitted to HUD as it occurs. All amendments will also be made public by posting at the City Clerk's Office, the DPD, and on the City of Lowell's website (www.lowellma.gov). Amendments involving at least \$25,000 will also be advertised in the local newspaper. The amendment may be implemented immediately after submitting it to HUD and making it public.

A **substantial amendment** to the Consolidated Plan or annual Action Plan is defined by the City as a transfer between two or more Plan activities that is greater than 50% of the ESG program funds, 30% of the HOME program funds, and 20% of the CDBG program funds.

Substantial amendments to the Plan will need to be presented to the Citizen Advisory Committee and the Lowell City Council for their review and approval. The public will also be notified by advertising the amendment in the local newspaper. The advertising of the substantial amendment will begin a thirty (30) day citizen review and comment period. The City will consider any comments or views of citizens received in writing or orally during the comment period, and will be submitted to HUD, and made available at the Pollard Library, City Clerk's Office, and the DPD. The City Manager will submit to HUD, a letter authorizing the amendment after the thirty-day comment period, and will implement the amendment at that time.

PERFORMANCE REPORT

At the end of each program year, as required by HUD, a Comprehensive Annual Performance and Evaluation Report (CAPER) must be submitted to HUD by September 30th. The CAPER gives an actual account of activities, which occurred during the previous program year, and how the City maintained and expended funds, which were outlined in the annual Action Plan for that program year.

Upon completion of the CAPER, and at least fifteen (15) days prior to its submission to HUD, the City will make the Report available to the general public for a fifteen

(15) day review and comment period. Any comments received from the general public will be included in CAPER submitted to HUD.

The City will provide a notice in the local newspaper for the availability of the CAPER, which will begin a fifteen-day review and comment period. A public notice will be advertised at least one week in advance, and published two times prior to the review period. The notice and the draft CAPER will also be made available to the public via the City's website (www.lowellma.gov).

PUBLIC HEARING REQUIREMENTS

The City, with its Citizen Advisory Committees, will provide at least two (2) public hearings during the fiscal year to obtain citizen's views and to respond to proposals and questions related to the CDBG, HOME, and ESG programs. The first hearing will also provide a forum for discussion and questions related to the HOPWA program.

The first hearing will be held at the beginning of the development process for the Annual Action Plan, and will be conducted early in the calendar year, at approximately the time HUD announces the annual entitlement amount for the CDBG, HOME, ESG, and HOPWA programs to the City. The goal of this Hearing will be to obtain views from citizens on housing and community development needs and activities, including priorities for non-housing community development needs. The citizen input during this meeting will directly shape the needs and priorities to be addressed by the spending plan in the consolidated plan annual action plan for the program year beginning July 1st of that year.

The second hearing will be held when the Draft Annual Action Plan has been completed and has been advertised as available for the required 30-day public review and comment period.

All public hearings will be advertised by publication in a newspaper of general circulation throughout the area(s) eligible to receive funds under the programs advertised at least twice prior to the hearing date, the first occurring no later than two weeks prior to the hearing date. All public hearing notices will also be posted on the City of Lowell's website (www.lowellma.gov) and on the local cable access channel at least two weeks prior to the hearing date. The City will consider any comments or views of citizens received in writing or orally at a public hearing. Each hearing will be held in the evening at facilities that are handicapped accessible. (Recent locations include the Lowell Senior Center, the Lowell Housing Authority's Armand P. Mercier Community Center, and the Pollard Memorial Library. All of these locations are convenient to potential and actual beneficiaries, and will accommodate persons with disabilities).

Each public hearing notice must include the availability of an interpreter if a significant number of non-English speaking or hearing-impaired persons are expected to participate at the hearing. Public hearing notices will be translated into Spanish, Khmer, and Portuguese. It will be the responsibility of the residents to notify the City at least four days in advance of the hearing if interpreter services are needed. Each public hearing notice will indicate this policy and provide a telephone number to contact the City.

In the course of developing their recommendation for a spending plan for the annual Action Plan, the Citizen Advisory Committees may hold a series of additional public

meetings to both provide information on the solicitation of proposals and the review of all proposals for consideration for funding. All public meetings of this nature will be advertised in accordance with the applicable provisions of the Massachusetts Open Meeting Law (Mass. General Law c. 34B, § 1), including postings of public notice of the meeting.

ACCESS TO RECORDS

The City will provide citizens, public agencies and other interested parties access to information and records relating to the City's Consolidated Plan and the City's use of funds for the CDBG, HOME, and ESG funds for the preceding five years. Citizens must allow the staff of DPD up to twelve working days to compile and provide the information requested by the citizen.

TECHNICAL ASSISTANCE

The DPD will provide technical assistance to the Citizen Advisory Committee and groups representative of persons of low and moderate income that request such assistance in developing proposals for funding assistance under any of the federal or state program covered by the consolidated plan. The level and type of assistance will be determined by the DPD, and may not include the provision of funds to any person, group, or agency.

COMPLAINTS

Citizens with complaints related to the Consolidated Plan, amendments, and the annual performance report must submit the complaint in writing to:

Division of Planning and Development
JFK Civic Center
50 Arcand Drive
Lowell, Massachusetts 01852
Attention: Director

If the complaint is given orally, the person initiating the complaint must schedule a meeting with the Director at the above-mentioned address and a formal complaint letter will be transcribed. The person must sign the letter and submit an address for response.

Upon receipt of the written complaint, the DPD will respond to complaint in writing within fifteen working days. A meeting to discuss the complaint must be scheduled by the person initiating the complaint.

USE OF THE CITIZEN PARTICIPATION PLAN

The requirements for citizen participation do not restrict the responsibility or authority of the jurisdiction in the development and execution of the City's Consolidated Plan.

ANTI-DISPLACEMENT AND RELOCATION PLAN

The City of Lowell has as a goal, the non-displacement of any person(s) currently residing in standard housing (housing that does or will meet the HUD Housing Quality Standards with minimal improvements). However, the City also has a goal to not allow any person(s) to reside in dangerous and/or substandard housing. When

the health and safety of any person is threatened due to the condition of their current housing, the City, when notified of the condition, will attempt to assist the property owner in bringing the housing up to HQS standards, remove such substandard housing, or recommend temporary or permanent displacement of the person(s) residing therein.

Under the ***Optional Relocation Assistance Policy and Program for the CDBG Program*** which was established in December 1997, the City will provide, if funds are available, relocation assistance, relocation payments, and rental assistance payments to any person(s) who is displaced, permanently and involuntarily, from any existing housing unit as a direct result of the enforcement of Article II of the Massachusetts State Sanitary Code.

If the City provides, or proposes to be providing, any CDBG, HOME, or other HUD-funded assistance to acquire, demolish, bring any existing housing units up to the minimum local health and building code requirements, or any action results in the direct permanent displacement of any legal resident(s), it will comply with the procedures, and provide the benefits, outlined in the ***Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4601), as amended***; the implementing regulations issued by the Department of Transportation at 49 CFR 24; and ***Section 104(d) of the Housing and Community Development Act of 1974 [42 U.S.C. 5304(d)]***.

Prior to any action that will result in the displacement of any existing residents of existing housing units, the City will notify all effected residents of the intended displacement action, and the extent of the benefits that will be available to each impacted person as outlined in 42 U.S.C. 4601 and 5304(d), and 49 CFR 24.

2. COMMENTS RECEIVED

To be developed following comment period

3. EFFORTS TO BROADEN PARTICIPATION

The components of the citizen participation plan discussed above have been designed with the explicit intention of accommodating and encouraging participation by low and moderate income residents, residents of low and moderate income neighborhoods, members of minority groups, persons with limited English skills, and persons with disabilities.

In addition to these efforts, as was discussed above; the City of Lowell has recently completed and adopted a twenty-year Master Plan. That plan was guided in large part by the results of an extensive public opinion research process. This process included a 1001 household telephone survey conducted in five languages (Spanish, Khmer, Portuguese, and Brazilian Portuguese in addition to English) with careful scientific sampling techniques used to ensure proportional representation among various minority, geographic, age, and income groupings. Survey respondents included 273 households earning below \$30,000 annually and 233 households earning between \$30,000 and \$49,999 annually. The Master Plan outreach effort also included an extensive telephone survey of businesses, several resident focus groups, and interviews with 60 community leaders, all of which included proportional participation by minority and low-income residents. The results of this outreach and

the subsequent plan also have played a primary role in the development of this Consolidated Plan.

Finally, plan development consultations included specific targeted outreach to service providers, subrecipients, and their clients involved in the delivery of eligible program activities to eligible populations. These consultations necessarily involved the active participation of members of minority groups, low and moderate-income individuals, persons with limited English skills, and individuals with disabilities.

4. COMMENTS NOT ACCEPTED

To be developed following comment period

Institutional Structure (91.215 (i))

- 1. Explain the institutional structure through which the jurisdiction will carry out its consolidated plan, including private industry, non-profit organizations, and public institutions.*
- 2. Assess the strengths and gaps in the delivery system.*
- 3. Assess the strengths and gaps in the delivery system for public housing, including a description of the organizational relationship between the jurisdiction and the public housing agency, including the appointing authority for the commissioners or board of housing agency, relationship regarding hiring, contracting and procurement; provision of services funded by the jurisdiction; review by the jurisdiction of proposed capital improvements as well as proposed development, demolition or disposition of public housing developments.*

3-5 Year Strategic Plan Institutional Structure response:

1. INSTITUTIONAL STRUCTURE

The City of Lowell Division of Planning and Development (DPD) is the lead administrative agency for the Consolidated Plan programs. The DPD provides fiscal and regulatory oversight of all CDBG, HOME, ESG, HOPWA, and McKinney funding sources as well as other Federal and State grants for housing, economic, and community development.

The Lowell City Council acts as the final authority for the appropriation of funds for Annual Action Plan activities under the Consolidated Plan grant programs, following the recommendations of the Citizens Advisory Committee and the City Manager.

Within each of the priority funding areas, activities will be completed and managed by a diverse team of public, private, not-for-profit, and institutional partners. The lists below identify some of the principal partners for each priority funding area.

Homeless/HIV/AIDS

AIDS Action Committee	Lowell Community Health Center
AIDS Housing Corporation	Lowell Continuum of Care
Alternative House	Lowell Housing Authority
Bedford Veterans Affairs Office	Lowell Transitional Living Center, Inc.
Cambridge Cares About AIDS	Mental Health Assoc of Greater Lowell

City of Lowell DPD	Metropolitan Boston Housing Partnership
City of Lowell Health Department	Pathfinder
City of Lowell Hunger/Homeless Commission	SHIFT Coalition
Community Teamwork, Inc	Southern Middlesex Opportunity Council
Greater Lowell Interfaith Coalition	St. Julie Asian Center
House of Hope Inc.	Tri-City Community Action Program
Justice Resource Institute	

Non-Homeless Special Needs

Asian Task Force Against Domestic Violence	Lowell Housing Authority
Cambodian Mutual Assistance Association	Lowell Transitional Living Center, Inc.
Central Food Ministry, Inc.	Mass Alliance of Portuguese Speakers
Christmas in April Lowell	Mental Health Assoc of Greater Lowell
City of Lowell Council on Aging	Merrimack Valley Catholic Charities
City of Lowell Hunger/Homeless Commission	Merrimack Valley Food Bank, Inc.
Community Teamwork, Inc	Open Pantry of Greater Lowell Inc.
Concord Family & Youth Services	Rape Crisis Services of Greater Lowell
D'Youville Senior Care Center, Inc.	Recruitment Resources Consulting
Greater Lowell Interfaith Coalition	Retarded Adult Rehab Association
Lao Family Mutual Association of Lowell, Inc.	Salvation Army
LifeLinks	St. Julie Asian Center
Lowell Association for the Blind, Inc	The Community Family, Inc.
Lowell Community Health Center	

Rental Housing

Acre Plan CAC	House of Hope Inc.
Cambodian American League of Lowell	Lowell Housing Authority
City of Lowell DPD	Lowell Transitional Living Center, Inc.
Coalition for a Better Acre	Merrimack Valley Catholic Charities
Community Teamwork, Inc	Pathfinder
D'Youville Senior Care Center, Inc.	Residents First Development Corporation

Owner-Occupied Housing

Acre Plan CAC	Lowell Development and Finance Corporation
City of Lowell DPD	Lowell Parks and Conservation Trust
Coalition for a Better Acre	Merrimack Valley Catholic Charities
Community Teamwork, Inc	Merrimack Valley Housing Partnership
Common Ground	Residents First Development Corporation
Habitat for Humanity of Greater Lowell	

Public Facilities

Back Central Neighborhood Association	City of Lowell Dept. of Parks and Recreation
Centralville Neighborhood Action Group	

City of Lowell Council on Aging	
City of Lowell DPD	City of Lowell Police Department
City of Lowell Fire Department	City of Lowell Department of Public Works
City of Lowell Health Department	City of Lowell Wastewater Utility
City of Lowell Information Technology Department	City of Lowell Water Utility
City of Lowell Division of Neighborhood Services	Middlesex Community College
City of Lowell Parking Department	University of Massachusetts Lowell

Infrastructure

City of Lowell DPD	City of Lowell Police Department
City of Lowell Fire Department	City of Lowell Department of Public Works
City of Lowell Information Technology Department	City of Lowell Wastewater Utility
City of Lowell Parking Department	City of Lowell Water Utility
City of Lowell Dept. of Parks and Recreation	Lowell Telecommunications Corporation

Economic Development

Acre Family Day Care Center	Cultural Organization of Lowell
Cambodian American League of Lowell	Lowell Development and Finance Corporation
Cambodian Mutual Assistance Association	Lowell Historic Board
City of Lowell DPD	The Lowell Plan
City of Lowell Parking Department	Lowell Small Business Assistance Center
City of Lowell Department of Public Works	Middlesex Community College
Coalition for a Better Acre	University of Massachusetts – Lowell
Community Teamwork, Incorporated	UMass Lowell Research Foundation

Public Services

Acre Family Day Care Center	Lowell Community Health Center
Angkor Dance Group	Lowell Transitional Living Center, Inc.
Asian Task Force Against Domestic Violence	Mass Alliance of Portuguese Speakers
Big Brother/Big Sister	Mental Health Assoc of Greater Lowell
Boys & Girls Club of Greater Lowell, Inc.	Merrimack Valley Catholic Charities
Cambodian American League of Lowell	Merrimack Valley Food Bank, Inc.
Cambodian Mutual Assistance Association	Open Pantry of Greater Lowell Inc.
Central Food Ministry, Inc.	Rape Crisis Services of Greater Lowell
Christmas in April Lowell	Recruitment Resources Consulting
City of Lowell Council on Aging	Retarded Adult Rehab Assoc.
City of Lowell Hunger/Homeless Commission	Salvation Army
Coalition for a Better Acre	Spindle City Corps
Community Teamwork, Inc	St. Julie Asian Center
Concord Family & Youth Services	Suitability
Girls, Inc.	The Community Family, Inc.
House of Hope Inc.	United Teen Equality Center (UTEC)
Lao Family Mutual Association of Lowell, Inc.	West End GYM Inc.

LifeLinks
Lowell Association for the Blind, Inc

YMCA
YWCA

2. CONSOLIDATED PLAN DELIVERY SYSTEM

Lowell is a City that prides itself on a decades long track record of successful partnerships among public and private sector entities. The delivery system for the Consolidated Plan programs is no exception. Communication and cooperation between the City of Lowell Division of Planning and Development (DPD) and the partner agencies and organizations that administer activities is strong.

In past years, DPD staff have worked closely with the other organizations involved in the Consolidated Plan programs to improve regulatory compliance, monitoring, cooperation and partnerships among agencies, and technical capacity of organizations involved in project delivery.

The single most significant impediment that remains in the delivery system remains the lack of available funding to support community development, economic development, and affordable housing projects. State funding has been drastically reduced by several years of fiscal challenges for the Commonwealth of Massachusetts, private sources have been reduced as their foundation endowments and corporate profits have shrunk in recent years, and City funds are extremely limited as the City government attempts to compensate for significant reductions in local aid from the state government. Finally, as the City's entitlement grants continue to shrink every year, despite increases in the cost of service delivery, it becomes more and more difficult to maintain existing levels of activity, nearly impossible to effectively expand services, and challenging to address major new initiatives. The lack of sufficient funding is particularly acute in terms of housing production as Eastern Massachusetts continues to lead the nation in the cost of housing.

Other potential gaps in the delivery system include the duplication of services among multiple not-for-profit agencies providing public services and the comparatively small number of experienced community development corporations involved in the production of affordable housing and public facilities for a city the size of Lowell. The DPD is attempting to address these gaps in the coming years by strongly encouraging partnerships among public service providers and by aggressively promoting the creation and designation of Community Housing Development Organizations and providing support and training to help these groups become more established and successful.

3. PUBLIC HOUSING DELIVERY SYSTEM

The Lowell Housing Authority is a public body consisting of a five member Board of Commissioners. Organizationally, the Authority is separate and distinct from the City of Lowell in that it does not fall within the City's existing governmental structure.

However, the City of Lowell does maintain a degree of control in the form of appointments to the Lowell Housing Authority's Board of Commissioners. The City of Lowell, acting by and through the City Manager with conformation from the Lowell City Council, appoints four of the Authority's five Board members. The Governor of the Commonwealth of Massachusetts makes the fifth appointment.

In terms of relationships regarding hiring, contracting and procurement, the Lowell Housing Authority undertakes and completes the aforementioned items, through its Executive Director and administrative staff, independently of the City of Lowell. Nonetheless, the LHA must adhere to hiring practices required by the federal Department of Housing and Urban Development and the Massachusetts Department of Housing and Community Development. Contracting and procurement activities are governed by Massachusetts General Law. Applicable statutes include Chapters 149A and 30B.

In terms of the provision of services funded by the City of Lowell, residents of public and assisted housing are entitled to the use and benefit of services provided and funded by the City of Lowell in much the same way as all residents of the City of Lowell are entitled to the use and benefit of City of Lowell services.

Additionally, the Lowell Housing Authority applies to the City of Lowell for funding provided by the City's Community Development Block Grant and HOME Program funds, LHA residents are entitled to benefit from services and activities funded through CDBG and HOME Program funds.

The City of Lowell has some input in the review of procedures for proposed sites for development of public or assisted housing. Specifically, in order to implement a plan which proposes to develop additional public or assisted housing, the LHA must amend the Corporation Agreement currently existing between the City of Lowell and the Lowell Housing Authority. This requires a vote of the Lowell City Council. Major development proposals are also subject to the applicable review by City of Lowell Boards and Commissions, including the Planning Board, Conservation Commission, and Zoning Board of Appeals, under the Code of Ordinances of the City of Lowell and Massachusetts General Laws.

As part of the Quality Housing and Work Responsibility Act of 1998, all housing authorities are required to develop and submit to HUD for approval a Comprehensive Five Year Plan. Said Plan must be approved by the City of Lowell prior to submission to HUD. Therefore, the City of Lowell does have a built in mechanism for review of the Lowell Housing Authority's planned activities over a five-year period. The content of the LHA's five-year plan is coordinated with the content of this Consolidated Plan.

In terms of proposed demolition and/or disposition of LHA owned public housing, HUD requires that, prior to demolition/disposition, the City of Lowell must approve in writing said demolition/disposition. Consequently, the City of Lowell has a built in review and approval process for proposed LHA demolition/disposition activities.

Monitoring (91.230)

1. *Describe the standards and procedures the jurisdiction will use to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.*

3-5 Year Strategic Plan Monitoring response:

1. MONITORING

The City of Lowell's Division of Planning and Development shall conduct at least one on-site monitoring visit for each sub-recipient during the program year; new sub-recipients may be visited a second time in order to assist with questions and check on program progress.

A monitoring schedule will be prepared and the sub-recipient visits will be prioritized by determining if any organizations are considered high risk, i.e., new to the CDBG program—first year as a sub-recipient; high staff turnover—especially in key positions; previous compliance or performance problems; or carrying out high-risk activities, such as economic development and/or multiple CDBG activities for the first time.

First, the assigned monitor contacts the agency to explain the purpose of monitoring and schedule a date and time for the on-site visit. Once this is completed, a confirmation letter is sent before the scheduled visit to confirm all aspects of the monitoring and to explain what can be expected.

In preparation for the monitoring visit, the monitor will review all written data on file for the sub-recipient, such as application for CDBG funding, written agreement and amendments, monthly reporting requirements, documentation of previous monitoring, and copies of audits.

During the actual visit, a thorough review of the sub-recipients files ensures they comply with all regulations governing their administrative, financial and programmatic operations; and are achieving their performance objectives within schedule and budget. A clear written record of the on-site visit is kept by using one or more of the City of Lowell's monitoring checklists. The assigned monitor will fill out the form during the visit.

At the end of the visit, the monitor concludes the visit by reviewing the tentative conclusions from the monitoring. At this point, there will be a clear understanding between the monitor and sub-recipient of the areas of disagreement and agreement regarding the monitoring results.

Once the on-site visit is completed, the monitor prepares a formal written letter describing the results of the visit, providing recognition of the sub-recipient's strengths and weaknesses. A copy of this letter should be kept on file with the sub-recipient's grant agreement and monthly reports.

If the sub-recipient is experiencing problems or is failing to comply with regulations, these issues will be specifically outlined in the monitoring follow-up letter, along with recommendations or requirements to address' and rectify the problems. If a **concern** or **finding** is issued for noncompliance with Federal rules and regulations, the monitoring follow-up letter will provide recommendations on how the situation can be remedied, but no additional action is required. When a **finding** is issued, the monitoring follow-up letter will identify a deadline for when the specific issues must be corrected. The monitor will then follow-up with the organization to make sure the corrections have been made.

For situations in which the recommended corrections have not been made, the organization will be placed on a probationary period, which must be approved by the

Assistant City Manager/DPD Director, until the issues have been rectified and they are once again in compliance with Federal regulations and the grant agreement.

Priority Needs Analysis and Strategies (91.215 (a))

1. Describe the basis for assigning the priority given to each category of priority needs.
2. Identify any obstacles to meeting underserved needs.

3-5 Year Strategic Plan Priority Needs Analysis and Strategies response:

-Please see General Questions responses above-

Lead-based Paint (91.215 (g))

1. Estimate the number of housing units that contain lead-based paint hazards, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income, and moderate-income families.
2. Outline actions proposed or being taken to evaluate and reduce lead-based paint hazards and describe how lead based paint hazards will be integrated into housing policies and programs.

3-5 Year Strategic Plan Lead-based Paint response:

1. PREVALENCE OF LEAD-BASED PAINT HAZARDS

ESTIMATED PREVALENCE OF LEAD-BASED PAINT HAZARDS

If the following assumptions, listed below, are made, then an estimate of this number can be made. The data available, and used in estimating this number, is from the year 2000 United States Census.

All housing units built before 1980 are counted herein as being likely to have lead paint hazards present, because 1978 was the first year that federal law prohibited lead in paint. Housing age information is available in increments of 10 year time periods. As not all supplies of lead paint were used up immediately after the enactment of this law there will be instances wherein paint with lead was used in houses built soon after the passage of the law. Thus, to be conservative on this estimate, and to not leave out potentially hazardous housing units, houses being built up to 1980 are counted.

In the City of Lowell, the vast majority of housing units (85%) were built before 1980. These total approximately 32,191 units out of a total of 37,887.

Lowell Housing Stock by Age and Tenancy

Age	Renter	Percentage	Owner	Percentage	Total units
Built 1980 and up	3,183	8.4%	2,513	6.6	5,696
Built 1970 to 1979	2,624	6.9%	900	2.4	3,524

Built 1960 to 1969	2,368	6.3%	1,804	4.8	4,172
Built 1950 to 1959	2,163	5.7%	1,720	4.5	3,883
Built 1940 to 1949	2,030	5.4%	1,129	3.0	3,159
Built 1939 or earlier	9,189	24.3%	8,264	21.8	17,453
TOTAL	21,557	56.9%	16,330	43.1%	37,887

Source: US Census 2000

PREVALENCE AMONG EXTREMELY-LOW, LOW, AND MODERATE-INCOME FAMILIES

Based on the 2000 U.S. Census, 57.81 percent of Lowell's residents are low and moderate income. If these extremely low- low- and moderate- income persons are aggregated into low- and moderate- income families, and if it is assumed that they occupy a percentage of the City's housing units (proportional to their population) then as many as 57-58% of all the pre-1980 housing units could be reasoned to be occupied by low- and moderate-income families. This number may be even higher, since the low income population may be more likely to live in older housing than people with greater means. However, all units owned by the Lowell Housing Authority have been deleaded.

Estimated Lead Hazards in Low- and Moderate-Income Housing

	Total Households	Lowell Housing Authority Units	Estimated Housing Units with Lead Hazards
Extremely Low-Income (<30% AMI)	8472	1650*	6200
Low-Income (30-50% AMI)	5593	240*	4800
Moderate Income (50-80% AMI)	6910	13*	6000
TOTAL	20975	1893	17000

*estimates

Source: CHAS Data, LHA, US Census

The City of Lowell estimates the number of housing units that may have low- and moderate- income families that may have lead paint hazards present to be approximately 17,000.

Regardless of the precise numbers, Lowell has an aging housing stock and a sizable proportion of extremely low-, low-, and moderate- income individuals and families.

Although the Lowell Lead Program has made great strides since 1998, Deleading approximately 600 units, it can be plainly seen that much more work needs to be done.

2. EVALUATION AND REDUCTION OF LEAD PAINT HAZARDS

DESCRIPTION OF THE LOWELL LEAD PROGRAM

Lowell has had a highly active program for the evaluation and reduction of lead paint hazards since 1998. The Lowell Lead Program (LLP) is centered in the City's Division of Planning and Development, and integrates its activities with the Housing Rehabilitation Program, also in this division. The LLP program integrates funding from both federal and state sources. These include funds from HUD, both through the CDBG program and the Lead-based Paint Hazard Control Program. The LLP also acts in concert with a host of community groups, private organizations, and government entities at all levels. In addition, the program has had ongoing outreach and input from homeowners, investors, and tenants that it serves directly.

The Division of Planning and Development will continue, as funding levels allow, to work with the City of Lowell Health Department and the Massachusetts Department of Public Health to identify and evaluate lead based hazards throughout the City of Lowell. Information and identification of instances of lead poisoning and elevated blood lead levels in children are given highest priority when awarding grants and processing loan applications.

The Lowell Lead Program has worked closely with the following agencies, among others:

- Merrimack Valley Housing Partnership (MVHP)
- Institute for Environmental Education (IEE)
- Community Teamwork, Inc. (CTI)
- Greater Lawrence Community Action Council
- Lowell Health Department
- MassHousing
- Lowell Five Cent Savings Bank
- Enterprise Bank and Trust Company

INTEGRATION OF LEAD BASED PAINT EVALUATION AND REDUCTION IN HOUSING POLICIES AND PROGRAMS

The office intends to continue to work with these groups and individuals to achieve the maximum possible reduction of lead paint hazards.

Within City Hall, the LLP program works in concert with the City's Housing Rehabilitation Program so that all units in that program in need of de-leading receive it. All housing rehab applicants are first referred to the lead program for review of their lead hazard compliance status. The Lead program will qualify applicants and make sure the lead paint requirements are addressed prior to Rehabilitation's assistance. This assures compliance with title X, sections 1012 and 1013.

The LLP is committed to making as much progress as possible working towards achievement of HUD's goal to eliminate lead poisoning as a major health hazard by the year 2010.

However, the exemplary work of the LLP can only continue with adequate funding. Lowell's Lead Program has consistently been cited as a national model, and staff asked to train other communities. Unfortunately, despite this track record, the City was not awarded a 3 million Lead-Based Paint Hazard Control Program 2004 Super NOFA Grant to continue the program. One million dollars had been budgeted for each program year for the following three years. The City plans to re-apply in the spring, but efforts to address lead-based paint hazards will be compromised until funding is restored.

In the interim, monies from previous grants and from other sources will be used to continue its mission in a reduced capacity. As a way to get the most results from the remaining monies, only loans, not grants, will be given. CDBG funds and MassHousing funds will be used for this purpose. However, the office will be operating in a limited capacity as these lost grant funds provided for administrative costs of operations, events, outreach, and education. These activities will be, most unfortunately, curtailed pending further funding.

The LLP remains committed to its mission and will make every attempt to progress during the next five years in the Consolidated Plan period towards the goal of eliminating lead paint hazards in Lowell.

HOUSING

Housing Needs (91.205)

1. *Describe the estimated housing needs projected for the next five year period for the following categories of persons: extremely low-income, low-income, moderate-income, and middle-income families, renters and owners, elderly persons, persons with disabilities, including persons with HIV/AIDS and their families, single persons, large families, public housing residents, families on the public housing and section 8 tenant-based waiting list, and discuss specific housing problems, including: cost-burden, severe cost-burden, substandard housing, and overcrowding (especially large families).*
2. *To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must complete an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.*

3-5 Year Strategic Plan Housing Needs response:

1. HOUSING NEEDS

The tables below provide estimates of the housing needs among low- and moderate-income families in Lowell. The information presented is based primarily on data from HUD's Comprehensive Housing Affordability Strategy (CHAS), the City of Lowell estimates.

The tables document many areas where households are facing cost burdens (housing costs which exceed 30% of household income) and severe cost burdens (housing costs which exceed 50% of household income). Many of the households identified as having housing problems that do not face cost burdens are subject to overcrowding or substandard conditions. According to the 2000 US Census, 10% of housing units in Lowell have occupancies greater than 1.01 persons per room and 4% have occupancies greater than 1.51 persons per room. In 2000, 2.3% of rental units lacked complete plumbing facilities and 2.1% lacked complete kitchen facilities.

In addition, an analysis of epidemiological data from the Center for Disease Control and Massachusetts Department of Public Health yields an estimate of 405 individuals living with HIV/AIDS in Lowell as of October 1, 2004. The same study estimates that there are 2,284 individuals living with HIV/AIDS throughout Middlesex County, Lowell's HOPWA service area. The vast majority of these cases represent unique households, most of whom can be presumed to have some housing need.

Estimated Housing Needs
Households Earning Less than 30% of the Area Median Income

Renter	Elderly	NUMBER OF HOUSEHOLDS	100%	1,886
		With Any Housing Problems	55.7	1,051
		Cost Burden > 30%	54.4	1,026
		Cost Burden >50%	35.9	678
	Small Related	NUMBER OF HOUSEHOLDS	100%	2,265
		With Any Housing Problems	74	1,675
		Cost Burden > 30%	70	1,585
		Cost Burden >50%	47.7	1,080
	Large Related	NUMBER OF HOUSEHOLDS	100%	865
		With Any Housing Problems	90.2	780
		Cost Burden > 30%	78.6	680
		Cost Burden >50%	48	415
	All other hsholds	NUMBER OF HOUSEHOLDS	100%	2,084
		With Any Housing Problems	67.4	1,404
		Cost Burden > 30%	64.7	1,349
		Cost Burden >50%	48.9	1,020
Owner	Elderly	NUMBER OF HOUSEHOLDS	100%	828
		With Any Housing Problems	78.4	649
		Cost Burden > 30%	78.4	649
		Cost Burden >50%	55	455
	Small Related	NUMBER OF HOUSEHOLDS	100%	310
		With Any Housing Problems	90.3	280
		Cost Burden > 30%	90.3	280
		Cost Burden >50%	72.6	225
	Large Related	NUMBER OF HOUSEHOLDS	100%	59
		With Any Housing Problems	93.2	55
		Cost Burden > 30%	86.4	51
		Cost Burden >50%	72.9	43
	All other hsholds	NUMBER OF HOUSEHOLDS	100%	175
		With Any Housing Problems	80	140
		Cost Burden > 30%	80	140
		Cost Burden >50%	68.6	120
Hsholds with a Disabled Member		NUMBER OF HOUSEHOLDS	100%	4236
		With Any Housing Problems	71.2	3016

Source: CHAS Data, 2000 US Census

Estimated Housing Needs
Households Earning 30-50% of the Area Median Income

Renter	Elderly	NUMBER OF HOUSEHOLDS	100%	632
		With Any Housing Problems	50.2	317
		Cost Burden > 30%	49.5	313
		Cost Burden >50%	7.8	49
	Small Related	NUMBER OF HOUSEHOLDS	100%	1,460
		With Any Housing Problems	61	890
		Cost Burden > 30%	52.7	770
		Cost Burden >50%	5.1	75
	Large Related	NUMBER OF HOUSEHOLDS	100%	659
		With Any Housing Problems	72.7	479
		Cost Burden > 30%	31	204
		Cost Burden >50%	1.5	10
	All other hsholds	NUMBER OF HOUSEHOLDS	100%	1,105
		With Any Housing Problems	73.8	815
		Cost Burden > 30%	68.8	760
		Cost Burden >50%	17.2	190
Owner	Elderly	NUMBER OF HOUSEHOLDS	100%	884
		With Any Housing Problems	19.1	169
		Cost Burden > 30%	18.7	165
		Cost Burden >50%	11.3	100
	Small Related	NUMBER OF HOUSEHOLDS	100%	447
		With Any Housing Problems	74.3	332
		Cost Burden > 30%	73.4	328
		Cost Burden >50%	33.3	149
	Large Related	NUMBER OF HOUSEHOLDS	100%	163
		With Any Housing Problems	75.5	123
		Cost Burden > 30%	73	119
		Cost Burden >50%	11.7	19
	All other hsholds	NUMBER OF HOUSEHOLDS	100%	243
		With Any Housing Problems	71.2	173
		Cost Burden > 30%	71.2	173
		Cost Burden >50%	46.5	113
Hsholds with a Disabled Member		NUMBER OF HOUSEHOLDS	100%	1958
		With Any Housing Problems	58.9	1153

Source: CHAS Data, 2000 US Census

**Estimated Housing Needs
Households Earning 50-80% of the Area Median Income**

Renter	Elderly	NUMBER OF HOUSEHOLDS	100%	318
		With Any Housing Problems	13.5	43
		Cost Burden > 30%	13.5	43
		Cost Burden >50%	0	0
	Small Related	NUMBER OF HOUSEHOLDS	100%	1,663
		With Any Housing Problems	17	283
		Cost Burden > 30%	10.7	178
		Cost Burden >50%	0.6	10
	Large Related	NUMBER OF HOUSEHOLDS	100%	580
		With Any Housing Problems	62.9	365
		Cost Burden > 30%	4.3	25
		Cost Burden >50%	0	0
	All other hsholds	NUMBER OF HOUSEHOLDS	100%	1,554
		With Any Housing Problems	21.5	334
		Cost Burden > 30%	18	280
		Cost Burden >50%	0.6	10
Owner	Elderly	NUMBER OF HOUSEHOLDS	100%	862
		With Any Housing Problems	17.6	152
		Cost Burden > 30%	15.9	137
		Cost Burden >50%	3.9	34
	Small Related	NUMBER OF HOUSEHOLDS	100%	938
		With Any Housing Problems	46.7	438
		Cost Burden > 30%	46.3	434
		Cost Burden >50%	9.6	90
	Large Related	NUMBER OF HOUSEHOLDS	100%	560
		With Any Housing Problems	53.6	300
		Cost Burden > 30%	40.2	225
		Cost Burden >50%	1.8	10
	All other hsholds	NUMBER OF HOUSEHOLDS	100%	435
		With Any Housing Problems	60.9	265
		Cost Burden > 30%	60.9	265
		Cost Burden >50%	8	35
Hsholds with a Disabled Member		NUMBER OF HOUSEHOLDS	100%	1382
		With Any Housing Problems	31.5	435

Source: CHAS Data, 2000 US Census

There is most likely substantial overlap between the families described in the above tables and those on the public housing and tenant-based Section 8 certificate wait lists. The table below describes the families on these lists as of June 2004. The

Section 8 wait list has been closed for four years and has an annual turnover rate of 3%. The Public Housing wait list has been closed for 3 and 4 bedroom units for six years and has an overall annual turnover rate of 4%.

Housing Needs of Families on Lowell Housing Authority Waiting Lists

	Public Housing		Section 8	
	Families	%	Families	%
Waiting List Total	5059	100%	332	
Extremely Low Income ($\leq 30\%$ AMI)	4735	94%	308	92%
Very Low Income ($> 30\%$ but $\leq 50\%$ AMI)	303	6%	22	6%
Low Income ($> 50\%$ but $\leq 80\%$ AMI)	21	1%	2	$< 1\%$
Families with Children	2752	54%	236	71%
Elderly Families	674	13%	12	3%
Disabled Elderly	0	0%	N/A	N/A
Non-Elderly Families with Disabilities	1847	37%	96	28%
White	1892	37%	125	37%
Black	241	5%	39	11%
Hispanic	2022	40%	145	43%
American Indian	0	0%	2	$< 1\%$
Asian	898	18%	21	6%
One Bedroom	227	4%	N/A	N/A
Two Bedrooms	2340	46%	N/A	N/A
Three Bedrooms	351	7%	N/A	N/A
Four Bedrooms	82	2%	N/A	N/A
Five Bedrooms	10	$< 1\%$	N/A	N/A
5+ Bedrooms	0	0%	N/A	N/A

Source: LHA 2004 Annual Plan

Based on assessments of housing and construction costs in Lowell, the table below illustrates the City of Lowell's estimates of the average and total subsidy amounts that would be needed to address the CHAS housing needs outlined above. The average per unit subsidies are calculated by assuming that a household can pay up to 30% of their annual income on rent/mortgage payments and utilizes prevailing market costs for housing construction and sales. The subsidy required is the difference between what the market costs per housing unit are and the total amount the household can pay either as payments toward a 30-year mortgage or rental payments to cover a landlord's financing costs with a profit margin.

	Households with Need	Average Subsidy Required per Unit	Total Subsidy Required
0-30% AMI	6034	\$190,000	\$1,146,460,000
30-50% AMI	3298	\$100,000	\$329,800,000
50-80% AMI	2180	\$30,000	\$65,400,000
TOTAL	20975		\$1,541,660,000

2. DISPROPORTIONATE HOUSING NEEDS

The table below documents the proportions of all households in Lowell with housing needs identified by HUD's Comprehensive Housing Affordability Strategy (CHAS). Data is presented for various household income levels relating to the area median household income. The final column presents the thresholds over which minority groups would be identified as having a disproportionate housing need relative the population as a whole.

Median Family Income	Total Households	Households with Any Housing Problem	% with Any Housing Problems	Disproportionate Need Threshold
< 30% MFI	8,472	6,032	71.2%	81.2%
30.01 - 50% MFI	5,593	3,300	59.0%	69.0%
50.01 - 80% MFI	6,910	2,177	31.5%	41.5%
> 80.01% MFI	16,861	1,821	10.8%	20.8%

Source: 2000 CHAS Data

The following table presents CHAS housing need data for ethnic and racial groups in Lowell.

Median Family Income	Total Minority Households	Households with Any Housing Problem	% with Any Housing Problems	Disproportionate Need Threshold Exceeded?
BLACK NON-HISPANIC HOUSEHOLDS				
< 30% MFI	228	148	64.9%	No
30.01 - 50% MFI	205	135	65.9%	No
50.01 - 80% MFI	258	95	36.8%	No
> 80.01% MFI	487	78	16.0%	No
ASIAN NON-HISPANIC HOUSEHOLDS				
< 30% MFI	940	740	78.7%	No
30.01 - 50% MFI	580	440	75.9%	Yes
50.01 - 80% MFI	800	365	45.6%	Yes
> 80.01% MFI	1,855	501	27.0%	Yes
HISPANIC HOUSEHOLDS				
< 30% MFI	1,694	1,215	71.7%	No
30.01 - 50% MFI	864	530	61.3%	No
50.01 - 80% MFI	789	299	37.9%	No
> 80.01% MFI	959	185	19.3%	No

Source: 2000 CHAS Data

Based on this analysis, three income groups among Asians were found to have a disproportionate housing need relative to the City's population as a whole with comparable household incomes. Unfortunately, CHAS data for Asian populations is

extremely limited and does not specify the nature of the housing problems identified or the demographic characteristics of the households experiencing the problems.

Based on testimony given at a public hearing held in February 2005 to discuss impediments to fair housing and consultations with Asian community leaders in Lowell, a major cause of this disparity may be the difficulty that Asian immigrants in Lowell, the majority of whom are Cambodian, have establishing credit histories. For cultural and economic reasons, Southeast Asian immigrants often come to Lowell with no reported credit history and no history of banking activity. As a result, credit checks that are routinely run by landlords and mortgage financiers prior to leasing or purchasing housing often fail to result in qualifying credit scores for these populations. This lack of strong credit can result in denial of apartments or mortgages, forcing the applicant into less desirable or less adequate housing, which is not dependent on income. Often this lack of credit has no relationship to the applicant's real ability to pay based on income or available resources, which may explain the higher disparity of housing needs among Asians with higher incomes.

The City of Lowell works closely to involve Asian community in first time homebuyer training and other housing assistance programs. The first time homebuyer training courses, some of which are offered in Khmer, include lessons dealing with establishing and maintaining credit. The City and its subrecipients will continue to aggressively market these programs, along with fair housing education programs to this community with a goal of reducing these housing affordability disparities in future years.

Housing Market Analysis (91.210)

- 1. Based on information available to the jurisdiction, describe the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing; the housing stock available to serve persons with disabilities; and to serve persons with HIV/AIDS and their families.*
- 2. Describe the number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, (i.e. expiration of Section 8 contracts).*
- 3. Indicate how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units. Please note, the goal of affordable housing is not met by beds in nursing homes.*

3-5 Year Strategic Plan Housing Market Analysis responses:

1. MARKET CHARACTERISTICS

A. SUPPLY

During the 1990s, the total number of occupied housing units in Lowell increased by 2.3%, despite a reduction in the total number of units, according to the U.S. Census Bureau. This reduction may be attributable to the demolition of vacant and abandoned substandard housing and a decade of limited housing production, as a result of market conditions. The removal of blighted and abandoned buildings may have improved the livability of neighborhoods and contributed to the increase in the

number of occupied units. The majority (57%) of the City's housing units are renter-occupied, as indicated in the table below. This percentage dropped slightly between 1990 and 2000, as the number of owner-occupied units increased.

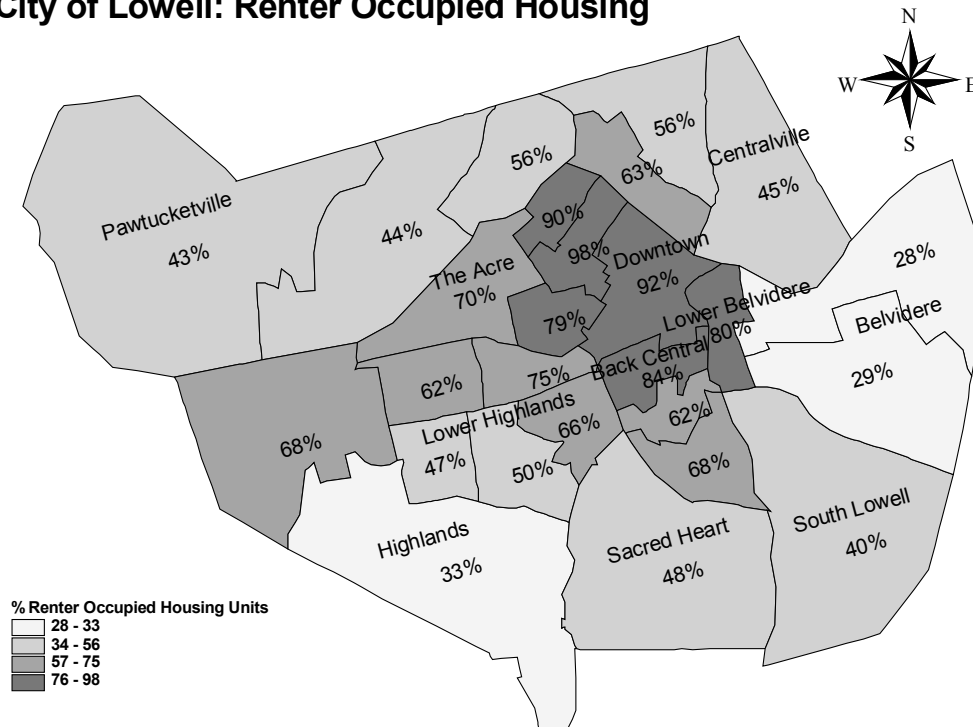
City of Lowell: Housing Units by Tenure (1990-2000)

	1990		2000		1990-2000
	Number	Percent	Number	Percent	% Change
Total No. of Units	40,302		39,468		-2.1%
Total No. of Occupied Units	37,019		37,887		2.3%
Ownership Units	15,508	41.0%	16,309	43.0%	5.2%
Rental Units	21,511	58.1%	21,578	57.0%	0.3%

Source: U.S. Census Bureau, 1990, 2000

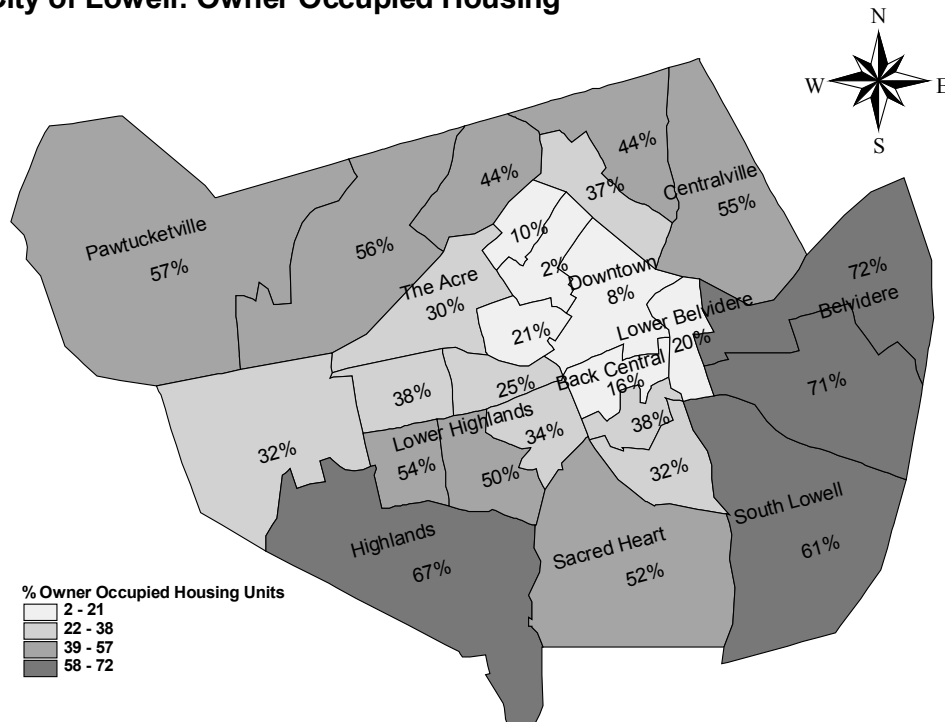
As the maps below indicate, the majority of rental units in Lowell are located in the center city. According to the 2000 U.S. Census, these neighborhoods are predominantly low-income and high minority concentrated census block groups. The Acre and Downtown sub markets, in particular, have the highest percentage of renter occupied housing. Conversely, the neighborhoods on the outer ring of the City have the lowest percentage of rental units, but have high concentrations of ownership units.

City of Lowell: Renter Occupied Housing



Source: U.S. Census Bureau, 2000

City of Lowell: Owner Occupied Housing



Source: U.S. Census Bureau, 2000

Regionally, the City of Lowell has the largest percentage of rental housing units. The table below illustrates the number of occupied rental housing units in the Lowell, MA-NH PMSA¹, according to the 2000 U.S. Census. The lack of rental units in the surrounding suburbs places a greater demand and higher price pressures on the City's rental market.

Lowell, MA-NH PMSA: Occupied Rental Housing Units (2000)

	<i>Billerica</i>	<i>Chelmsford</i>	<i>Dracut</i>	<i>Dunstable</i>	<i>Groton</i>	<i>Lowell</i>	<i>Pepperell</i>	<i>Tewksbury</i>	<i>Tyngsboro</i>	<i>Westford</i>
No. of RentalUnits	2,020	2,069	2,250	62	528	21,578	792	1,087	587	550
% of Total HousingUnits	15.6%	16.1%	21.5%	6.7%	16.2%	57.0%	20.6%	10.9%	15.7%	8.1%

Source: U.S. Census Bureau, 2000

¹ The Lowell, MA-NH PMSA includes: Billerica, Chelmsford, Dracut, Dunstable, Groton, Lowell, Pepperell, Tewksbury, Tyngsboro, Westford, MA; and Pelham, NH. For the purpose of this report, the town of Pelham, NH is not included in the analysis.

The 2000 Census documented a 1.2% vacancy rate for ownership housing units and a 3.1% vacancy rate for rental units. The 2000 Census reported 1,581 total vacant units, 699 of which were available for rent. Based on discussions with the Greater Lowell Landlords Association, the current vacancy rate for rental units has increased to 15% or 20%. This increase has resulted in part from a reduction in demand as a strong condominium market and low mortgage interest rates have enabled many people who might otherwise have rented to purchase units. While some rental units in the City have been converted to condominiums, there has not been a significant reduction in the overall supply of rental units in Lowell. A portion of this vacancy rate may also be due to landlords' reluctance to rent to potential tenants with limited ability to pay. According to the GLLA, landlords are reluctant to take on the risk of renting to households with poor, or no credit history.

B. CONDITION OF HOUSING STOCK

The majority of Lowell's housing stock was built prior to 1950 (52% of rental units and 68% of ownership units). As a result of its aging housing units, the presence of lead paint and substandard units is prevalent, especially among rental units. The 2001 Analysis of the Impediments to Fair Housing report, prepared by the City of Lowell, indicated that the existence of lead paint has contributed to discrimination practices in rental real estate. According to the report, many landlords in Lowell are reluctant to rent to families with young children, particularly because of lead paint laws and the high cost of compliance.

A second major concern with Lowell's rental housing supply is the percentage of units considered substandard, as defined by the U.S. Census. In 2000, 2.3 % of rental units in the City lacked complete plumbing facilities, while 2.1% lacked complete kitchen facilities.

A result of limited quality housing coupled with the high cost of housing has forced extended or multiple families to share housing space. As a result, overcrowding has become an issue in the City. The U.S. Census Bureau defines overcrowding as a household with greater than 1.01 persons per room, excluding bathrooms, kitchens, hallways, and porches. Severe overcrowding occurs when more than 1.51 persons per room. Data from the 2000 Census indicates that more than 10% of rental housing units in Lowell are overcrowded while 4% are severely overcrowded.

C. NEW CONSTRUCTION

While the number of building permits issued for new single-family home construction in the last five years has fluctuated, the number of permits granted for two-family and multifamily developments continues to grow. According to recent data from the City's Inspectional Services Department, the number of permits granted for two or more unit developments reached an all-time high in 2004. This increase is no doubt a result of the strong housing market and low interest rates, which have encouraged multifamily investor owned property sales in Lowell.

City of Lowell: Building Permit Profile (1999-2004)

Year	Permits Issued for New Construction			Total New Residential Units
	Single-Family	Two-Family	Multifamily	
2004	51	29	17	201
2003	75	16	16	176

2002	35	13	8	88
2001	34	11	5	76
2000	84	2	2	106
1999	73	0	1	97

Source: City of Lowell, Dept. of Inspectional Services

The table above does not include adaptive reuse projects. Located primarily in Lowell's downtown, these projects have resulted in more than 450 new occupied residential units in the last five years. Building permits have been issued for an additional 392 units now under construction, with 300 more currently in the permitting process.

According to the City's Dept. of Inspectional Services, building permits generally carry a construction cost of between \$100,000 and \$150,000 per unit depending on the size of the project. While no information is maintained locally regarding overall construction costs, the National Association of Home Builders tracks this information regionally. According to the NAHB, the average price per square foot for a single-family home in the Northeast was \$66.46 in 1992. This figure has steadily increased in more than ten years to \$96.74 in 2003. These prices have consistently been greater than those in other regions of the United States.

D. MARKET TRENDS

Rental Units

Using 2000 U.S. Census data, the National Low Income Housing Coalition (NLIHC) calculated that more than 30% of households in the Lowell, MA-NH PMSA rent. 20% of these households live below the poverty level.

According to the recently released Out of Reach, 2004 report, the Fair Market Rent (FMR) for a two bedroom in the Lowell, MA-NH PMSA is \$1,102. The estimated median annual income for renters in the region is \$37,150. Based on the assumption that a household spends 30% of its income on housing, NLIHC calculated that households would need an annual income of \$44,080 to afford a two-bedroom unit at FMR. An individual earning minimum wage (\$6.75/ hour in Massachusetts) would need to work 98 hours a week to afford a two-bedroom unit at FMR in the Greater Lowell region. According the NLIHC statistics, an individual would need to earn 314% of the Massachusetts minimum wage (or \$21.19 an hour) in order to afford a two-bedroom rental unit at the 2004 FMR.² The Housing Market Analysis Table documents the FMRs for housing units in the Lowell, MA-NH PMSA. The table below illustrates the income needed to afford housing units at the FMR.

Income Needed to Afford FMR

	Annual Income					Percent of Family AMI				
	0 BR	1 BR	2 BR	3 BR	4 BR	0 BR	1 BR	2 BR	3 BR	4 BR
Massachusetts	\$33,528	\$36,499	\$43,535	\$52,142	\$57,844	45%	49%	58%	69%	77%
Lowell, MA-NH PMSA	\$28,600	\$34,240	\$44,080	\$52,640	\$57,480	36%	43%	55%	66%	72%

Source: NLIHC, Out of Reach 2004

Based on conversations with the Greater Lowell Landlords Association (GLLA), the current rent for a one-bedroom apartment ranges from \$695 to \$895, and two-

² Out of Reach, 2004. NLIHC. www.nlihc.org; 12-23-2004)

bedroom apartments rent for \$795 to \$995 depending on the location and condition. More luxury apartments rent for as much as \$200 to \$400 more per month. According to the GLLA, current rents are about \$100-\$200 less than they were 2-3 years ago when vacancy rates were close to zero.

According to HUD's estimates for median rental rates in the Lowell, MA-NH PMSA, rents have increased in Greater Lowell by 18% from FY2002-03. Despite the increase, regionally, 2000 Census data show that Lowell maintains the lowest median gross rent among surrounding suburban communities. The variations in rental prices among these communities suggest added pressure on Lowell's rental market as households in the region search for affordable rental units.

Lowell, MA-NH PMSA: Median Gross Rent (2000)

	Billerica	Chelmsford	Dracut	Dunstable	Groton	Lowell	Pepperell	Tewksbury	Tyngsboro	Westford	Middlesex County	Massachusetts
Med. Gross Rent	\$897	\$777	\$725	\$908	\$728	\$627	\$697	\$936	\$701	\$690	\$835	\$684

Source: U.S. Census Bureau, 2000

Ownership Units

The Local Area Low Income Housing Database, supplied by the NLIHC, reports that close to 70% of households in the Lowell, MA-NH PMSA own their own home. Less than 3% of these households are below the poverty level, though close to a quarter of them spend more than 30% of their income on housing costs.

Following a decline during the recession of the early 1990s, housing prices increased dramatically in the past few years in the Lowell, MA-NH PMSA, as indicated by the tables below.

Median Single Family Sales Prices (1989-2004)

Year	Billerica	Chelmsford	Dracut	Dunstable	Groton	Lowell	Pepperell	Tewksbury	Tyngsboro	Westford
2004	\$345,000	\$350,000	\$287,500	\$396,000	\$447,500	\$248,900	\$334,950	\$348,100	\$325,000	\$457,000
2003	\$311,000	\$329,900	\$264,000	\$417,450	\$417,000	\$218,000	\$308,950	\$320,000	\$317,500	\$416,125
2002	\$289,950	\$300,000	\$236,000	\$390,000	\$352,500	\$195,000	\$282,500	\$290,000	\$294,705	\$398,450
2001	\$250,000	\$270,000	\$215,000	\$373,500	\$324,900	\$170,000	\$284,900	\$267,530	\$250,000	\$351,000
2000	\$222,950	\$243,000	\$186,500	\$335,000	\$324,500	\$144,700	\$240,000	\$239,900	\$260,900	\$325,000
1999	\$193,250	\$225,000	\$156,500	\$269,900	\$297,734	\$124,900	\$187,425	\$209,000	\$222,000	\$297,400
1994	\$136,225	\$159,555	\$119,450	\$163,000	\$194,750	\$78,500	\$135,000	\$148,250	\$150,000	\$209,450
1989	\$149,900	\$172,000	\$139,200	\$254,950	\$212,800	\$125,000	\$160,000	\$160,000	\$178,450	\$194,250
% Chng. ('00-'04)	54.7%	44.0%	54.2%	18.2%	37.9%	72.0%	39.6%	45.1%	24.6%	40.6%

Source: The Warren Group (www.thewarrengroup.com, March 2005)

Median Condominium Sales Prices (1989-2004)

Year	Billerica	Chelmsford	Dracut	Dunstable	Groton	Lowell	Pepperell	Tewksbury	Tyngsboro	Westford
2004	\$165,750	\$254,500	\$174,900	\$0	\$260,000	\$165,000	\$189,750	\$272,900	\$179,000	\$359,950
2003	\$164,675	\$231,000	\$164,900	\$0	\$250,500	\$144,900	\$167,000	\$252,250	\$177,900	\$354,900
2002	\$152,950	\$212,000	\$150,000	\$0	\$224,500	\$129,000	\$147,650	\$225,000	\$148,900	\$361,700
2001	\$116,250	\$189,000	\$125,900	\$0	\$197,000	\$104,900	\$134,900	\$192,500	\$112,450	\$339,900
2000	\$83,500	\$154,000	\$92,900	\$0	\$202,500	\$85,000	\$116,000	\$166,950	\$113,900	\$275,000
1999	\$76,399	\$140,950	\$83,000	\$0	\$144,000	\$68,900	\$91,500	\$153,500	\$82,050	\$248,900
1994	\$38,000	\$95,625	\$55,900	\$0	\$132,000	\$27,805	\$43,500	\$99,000	\$48,500	\$237,334
1989	\$105,000	\$130,000	\$99,900	\$0	\$125,520	\$99,900	\$101,000	\$114,900	\$98,000	\$232,250
% Chng. (00-04)	98.5%	65.3%	88.3%	0.0%	28.4%	94.1%	63.6%	63.5%	57.2%	30.9%

Source: The Warren Group (www.thewarrengroup.com, March 2005)

The median sale prices of condominiums in Lowell, in particular have increased significantly, compared with those in surrounding communities. As these tables illustrate, the condominium market is experiencing a tremendous boom. In the last five years, the number of condominium sales increased by 20% and the median sales price climbed 145%. While the number of single-family home sales declined in this same time period, the median sales price grew by nearly 100%.

A comparison of the Multiple Listing Service (MLS) property listings for Lowell in the last two years (table below) supports this data.

City of Lowell: MLS Property Listings

	December 2002		December 2004		% Change	
Property Type	No. of Listings	Med. List Price	No. of Listings	Med. List Price	No. of Listings	Med. List Price
Single Family	135	\$252,119	162	\$277,924	20%	10%
Multi Family	65	\$316,538	83	\$390,160	28%	23%
Condominium	84	\$144,741	151	\$196,999	80%	36%

Source: Coldwell Banker, www.newenglandmoves.com, Multiple Listing Service (MLS)

As the table above indicates, the condo market grew rapidly in the last two years, while little change has occurred in the sale of multi-family homes.

While the median sales price for single family homes in Greater Lowell increased by 72% between 2000 and 2004, an analysis of market trends indicates that households spent only 12% more on housing during this same time period.³ As the table below illustrates, households have consistently spent less than 20% of their income on housing in the past three years.

Lowell, MA-NH PMSA: % of Annual Income Spent on Housing

Year	AMI	Median Single- Family Housing Price	% of Interest Rate	% of Annual Income
------	-----	---	--------------------------	--------------------------

³ % Of Annual Income spent on housing is based on average weekly interest rates for 30-year mortgage with a 5% down payment. (Does not include income spent on homeowners insurance or property taxes.)

2000	\$64,900	\$144,700	8.05%	18.73%
2001	\$70,200	\$170,000	6.97%	18.31%
2002	\$75,200	\$195,000	6.54%	18.76%
2003	\$79,700	\$218,000	5.83%	18.36%
2004	\$80,000	\$248,900	5.84%	20.90%
2005*	\$80,400	\$227,500	5.71%	18.75%

* 2005 Data is based on information for January only.

Source: HUD, Fannie Mae, Warren Group

While homes in Lowell are more affordable than those in surrounding communities, the Lowell, MA-NH PMSA is considered less affordable than the Greater Boston region.

The National Association of Home Builders and Wells Fargo maintain information on housing affordability for metropolitan areas. According to data collected in the fourth quarter of 2004, housing in the Lowell, MA-NH PMSA is less affordable than in the Boston, MA-NH PMSA. The median family income in Greater Lowell is slightly less than that of Greater Boston, while the median sales price is much greater.

Housing Opportunity Index, Fourth Quarter 2004

Metro Area	Share of Homes Affordable for the Median Income	Median Family Income	Median Sales Price	Affordability Rank*	
				National	Regional
Boston, MA-NH PMSA	41.30%	\$82,600	\$336,000	121	22
Lowell, MA-NH PMSA	27%	\$80,000	\$375,000	133	28

* Affordability rankings are out of 169 metro areas surveyed nationally, 34 of which are in the northeast region.

Source: National Association of Home Builders (www.nahb.org) March 2005)

As the above table indicates, the Lowell PMSA has a smaller percentage of homes affordable to families at median income, than in the Boston metropolitan area. The share of affordable homes was at a three year high in 2001 with a housing opportunity index of 36% in Lowell and 47% in Boston.

E. HOUSING FOR PERSONS WITH DISABILITIES

The Lowell Housing Authority maintains approximately 49 accessible and adaptable rental units for disabled individuals. This number does not take into consideration any private accessible or adaptable housing units, group homes or human service agency facilities, or new units under construction. While the City's Department of Inspectional Services tracks building permits for residential alterations, there are no figures available to determine the number of permits issued specifically to adapt housing units to accommodate disabilities.

According to a 2005 inventory of subsidized housing units by the Massachusetts Department of Housing and Community Development, there are approximately 25 rental units operated as group homes through the Department of Mental Retardation and Department of Mental Health.

6.) HOUSING FOR PERSONS WITH HIV/AIDS AND THEIR FAMILIES

Two public service agencies in Lowell operate housing facilities and supportive services for individuals with HIV/AIDS. Together these facilities can accommodate up to 58 residents, primarily those who are homeless or at risk of becoming homeless. Additionally, these agencies provide housing support, (i.e. short term rental and utility assistance) for more than 150 individuals and families. As the only two agencies serving the housing needs of individuals with HIV/AIDS in the Greater Lowell area, the demand on these service providers is great.

2. ASSISTED HOUSING

M.G.L. Chapter 40B Subsidized Housing

Under Mass General Law Ch. 40B, Massachusetts Department of Housing and Community Development (DHCD) maintains inventories of affordable and subsidized housing in Massachusetts's communities. Ch. 40B establishes a goal that 10% of the housing stock in each community must be affordable and institutes an expedited development process for projects that include affordable housing in communities that fail to meet this requirement.

According to the latest inventory conducted by DHCD (March, 2005), more than 13% of Lowell's housing units qualify as affordable under Massachusetts General Law Chapter 40B. This figure is likely to increase through the creation of additional affordable housing units provided by the Julian D. Steele Reinvention and Replication Plans.

The table below includes the percentage of total housing units among communities in the Lowell, MA-NH PMSA, which qualify as affordable under the M.G.L. Ch 40B inventory. Lowell greatly exceeds other communities in the PMSA in terms of providing affordable housing.

Lowell, MA-NH PMSA: Ch 40B Affordable Housing Inventory (2004)

	<i>Billerica</i>	<i>Chelmsford</i>	<i>Dracut</i>	<i>Dunstable</i>	<i>Groton</i>	<i>Lowell</i>	<i>Pepperell</i>	<i>Tewksbury</i>	<i>Tyngsboro</i>	<i>Westford</i>
% Ch 40B	3.50%	5.60%	5.30%	0.00%	5.50%	13.10%	3.00%	4.40%	6.90%	2.20%

Source: Mass. DHCD (revised, March 1, 2005)

Public Housing

Public housing remains one of the most important contributors of affordable housing for low-income residents. The City of Lowell has approximately 5,174 units of subsidized housing. There are currently 255 State and 1,639 Federal public housing units in Lowell, all of which are managed by the Lowell Housing Authority (LHA). The majority of public housing sites are located in the neighborhoods, which are well served by public transportation.

The following tables describe the composition of occupied housing units within the LHA's jurisdiction. Less than 2% (35 units) of the public housing available in the City is vacant. Approximately half (48%) of LHA units are designated for families, while the remaining developments are limited to elderly households.

City of Lowell: LHA Properties

	Elderly	Family	Total
Public Housing-Subsidized Units			
State Assisted	190	65	225
Federally Assisted	802	836	1638
Total:	992	901	1893

Source: Lowell Housing Authority

The Housing Authority also records the racial makeup of its developments, based on the ethnicity of the head of household. Based on recent data, approximately 45% of households within the jurisdiction are minority (non-white).

City of Lowell: Characteristics of Occupied LHA Properties

Housing Development	Total Occupied Units		Type of Units	# Accessible Units	% White	% Hispanic	% Black	% Asian
705-C	23	19	Family		10.5%	47.4%	5.3%	36.8%
Archie Kenefick Manor	42	42	Elderly		100.0%	0.0%	0.0%	0.0%
Bishop Markham Village	399	381	Elderly	20	66.1%	24.4%	4.2%	5.2%
Dewey Archambault Towers	189	188	Elderly	2	81.4%	7.4%	2.7%	8.5%
Fr. Morrisette Manor	57	57	Elderly		94.7%	3.5%	1.8%	0.0%
Fr. Norton Manor	112	112	Elderly	0	91.1%	3.6%	3.6%	1.2%
Francis Gatehouse Mill	90	90	Elderly	8	96.7%	0.0%	1.1%	2.2%
George W. Flanagan Development	166	166	Family	6	32.5%	46.4%	6.0%	15.1%
Harold Hartwell Crt.	26	26	Family	0	23.1%	53.8%	7.7%	15.4%
Lagrange St.	10	10	Family		40.0%	60.0%	0.0%	0.0%
Lane-Liberty-Walker St.	32	31	Family		38.7%	32.2%	9.7%	19.4%
Lawrence - Faulkner St.	27	27	Elderly	3	100.0%	0.0%	0.0%	0.0%
North Common Village	524	520	Family	10	22.9%	54.6%	3.1%	19.4%
Scattered Sites	105	101	Family		17.8%	48.5%	1.0%	32.7%
Scattered Sites	67	64	Elderly		51.5%	37.5%	3.1%	7.8%
Scattered Sites (Community Residences)*	24	24	Family		n/a	n/a	n/a	n/a
Total	1893	1858		49				

Source: Lowell Housing Authority

* Records are not maintained on individual residences

Section 8 Rental Assistance

The Lowell Housing Authority also manages 1,286 rental assistance certificates/vouchers (both State and Federal). According to its FY 2004 Annual Plan, the LHA plans to apply for additional Section 8 units when they become available, in an effort to increase the number of affordable units, as well as to target more than

75% of all new admissions to the Section 8 program to families at or below 30% of area median income.⁴

In addition, there are nine regional non-profit housing agencies offering rental assistance, including Community Teamwork, Inc., which is based in Lowell. CTI currently provides 2,029 Section 8 vouchers. As of March 2005, all but 21 vouchers were currently under lease. CTI awards vouchers on a first-come, first-served basis from a waiting list provided by the state. The vast majority of these vouchers are used to rent apartments in Lowell.

Expiring Use

Among the subsidized housing units in Lowell, 360 are currently at risk of losing their affordability status before 2010. Unless the property owners renew their Section 8 contracts or consent to extending their affordability agreement, these units may be sold or rented at market rate, limiting the number of affordable units available to low- and moderate-income households.

City of Lowell: 2005 Subsidized Housing Inventory – Expiring Use

Property Name	Units at Risk - 2010	Affordability Expires
Choices in Living	25	2008
First Lowell Rehab	47	2005
Julie House	10	2009
Lowell Sun/Fr. John's Medicine	84	2007
Mazur Park Apartments	50	2008
Sect 8 Mod Rehab	20	2005
Southwick Block Apts.	28	2006
Townhouse of Lowell	96	2005

Source: Department of Housing and Community Development, 2005

3. MARKET INFLUENCE ON USE OF AVAILABLE FUNDS

The characteristics of the housing market will significantly impact how the City will direct its housing funds over the next five years. Specifically, the City intends to focus its monies on homeownership units, and on low- and moderate-income households.

With favorable interest rates and the comparatively low ownership rates relative to neighboring communities, the City of Lowell will continue to place greater importance on owner-occupancy. Homeownership provides households with an opportunity to build equity, and benefits the community by encouraging neighborhood stabilization.

The City also aims to direct its housing funds to moderate- and low-income households. The cost per unit subsidy required to support a moderate- or low-income household is less than that needed to support a very low-income household. Because of this, more housing units can be created with extremely limited funds, especially in a market with high sales prices and increasing construction costs.

⁴ LHA, Fiscal Year 2004 Public Housing Authority Annual Plan.

Priority Housing Needs (91.215 (b))

1. Identify the priority housing needs in accordance with the categories specified in the Housing Needs Table (formerly Table 2A). These categories correspond with special tabulations of U.S. census data provided by HUD for the preparation of the Consolidated Plan.
2. Provide an analysis of how the characteristics of the housing market and the severity of housing problems and needs of each category of residents provided the basis for determining the relative priority of each priority housing need category.
Note: Family and income types may be grouped in the case of closely related categories of residents where the analysis would apply to more than one family or income type.
3. Describe the basis for assigning the priority given to each category of priority needs.
4. Identify any obstacles to meeting underserved needs.

3-5 Year Strategic Plan Priority Housing Needs response:

1. PRIORITY HOUSING NEEDS

The following table outlines the City of Lowell's priority housing needs for the 2005-2010 Consolidated Plan period. Activities which are labeled as "High" priorities in the tables below and elsewhere in this plan are those which will receive Consolidated Plan funding assuming level funding of the City's formula grants over the next five years. Activities which are identified as "Medium" priorities are those which will likely receive Consolidated Plan funding if the applicable formula grants to the City of Lowell are increased during the next five years and may also receive funds if particularly strong projects are identified. Activities that receive a "Low" priority will not receive Consolidated Plan funding over the next five years without an amendment to this Consolidated Plan.

HOUSING NEED	PRIORITY	FUND SOURCE
<u>RENTAL HOUSING</u>		
0-30% AMI Elderly	Medium	HOME, Other
0-30% AMI Small Related	Medium	HOME, Other
0-30% AMI Large Related	Medium	HOME, Other
0-30% Other	Medium	HOME, Other
30-50% AMI Elderly	Medium	HOME, Other
30-50% AMI Small Related	High	HOME, Other
30-50% AMI Large Related	High	HOME, Other
30-50% Other	High	HOME, Other
50-80% AMI Elderly	Low	Other
50-80% AMI Small Related	Medium	HOME, CDBG, Other
50-80% AMI Large Related	Medium	HOME, CDBG, Other
50-80% Other	Medium	HOME, CDBG, Other
<u>OWNER-OCCUPIED HOUSING</u>		
0-30% AMI Elderly	Medium	HOME, Other
0-30% AMI Small Related	Medium	HOME, Other
0-30% AMI Large Related	Medium	HOME, Other
0-30% Other	Medium	HOME, Other
30-50% AMI Elderly	Medium	HOME, Other
30-50% AMI Small Related	High	HOME, Other

30-50% AMI Large Related	High	HOME, Other
30-50% Other	High	HOME, Other
50-80% AMI Elderly	Medium	HOME, CDBG, Other
50-80% AMI Small Related	High	HOME, CDBG, Other
50-80% AMI Large Related	High	HOME, CDBG, Other
50-80% Other	High	HOME, CDBG, Other

2-3. BASIS FOR ASSIGNING PRIORITIES

The priorities above are a reflection of four key factors listed in order of emphasis, the Julian D. Steele Reinvention and Replication Plans, housing market conditions, a strong desire to increase the homeownership rate in the City of Lowell, and the relative severity of needs. Each of these influences is discussed below.

A. THE JULIAN D. STEELE REINVENTION AND REPLICATION PLANS

In addressing priority housing needs in the City of Lowell it is crucial to highlight an action that is a driving factor in the City's efforts to provide safe, clean and affordable housing for those in need. On December 18, 2002 the State Legislature approved a plan (Chapter 97 of the Acts of 2002) that allowed the Lowell Housing Authority (LHA) to replace the troubled 224-unit Julian D. Steele state-funded public housing project with a new neighborhood consisting of 180 mixed income units. These units will be constructed in single and two-family owner-occupied homes.

The construction is privately financed through a consortium of local banks offering \$24 million dollars to the selected developers of the project. As a partner in this effort, the City of Lowell committed to using a combination of Consolidated Plan funds, Low Income Housing Tax Credits (LIHTC), project-based subsidies, and private funding to create 220 units of affordable housing scattered throughout the City and referred to as "Replication Units". The planned Replication Units carry the following affordability restrictions:

Affordable to households at or below 50% AMI for 30 years	79 Units
Affordable to households at or below 50% AMI for 15 years	78 Units
Affordable to households at or below 80% AMI for 30 years	32 Units
Affordable to households at or below 80% AMI for 15 years	31 Units
TOTAL Replication Units	220 Units

The 15-30 year affordability periods required for the Replication Units exceed HUD's HOME Program requirements. A priority goal is to complete the 220 Replication Units in the next five years. These projects will consist of substantial rehabilitation and high quality new construction, subject to the City's policy of utilizing energy star standards for all the new and rehabbed units.

The following table outlines the City's progress to date in completing the Replication Plan.

Affordable to households at or below 50% AMI for 30 years	
Completed	59

Under Construction/Permitting	47
Sites Selected/Out to Bid	0
Affordable to households at or below 50% AMI for 15 years	
Completed	0
Under Construction/Permitting	15
Sites Selected/Out to Bid	0
Affordable to households at or below 80% AMI for 30 years	
Completed	93
Under Construction/Permitting	5
Sites Selected/Out to Bid	4
Affordable to households at or below 80% AMI for 15 years	
Completed	22
Under Construction/Permitting	3
Sites Selected/Out to Bid	0

As a result, the City's priority in completing the Replication Plan requirements over the next five years is to construct an additional 53 units that will be affordable to households earning 50% of the Area Median Income or less with 15 year deed restrictions. Potential sites have been identified for approximately 65% of these units, many within the Acre Urban Revitalization and Development Plan area.

This need to complete the Replication Plan mandates translates to an emphasis on addressing the housing needs of family households earning between 30% and 50% AMI using the CHAS housing need categories above.

B. MARKET CONDITIONS

Market conditions have a significant and deterministic impact on the City of Lowell's priority housing needs. As is discussed in the Housing Needs section of this plan, under current construction and housing market conditions, the City of Lowell estimates that an average subsidy of approximately \$30,000 is required for each unit that is affordable to households earning between 50% and 80% of AMI.

Approximately \$100,000 in subsidy is required for each unit that is affordable for households earning between 30% and 50% of AMI and \$190,000 is required for each unit that is affordable for households earning between 0 and 30% of AMI. As a result, the City calculates that more than \$1.5 billion in subsidy would be required to address all of the housing needs identified in the CHAS tables for the City of Lowell. Because we anticipate having approximately \$8,900,000 in Consolidated Plan funds available over the next five years, even if matched with 3:1 or 4:1 with other funding, the City would only be able to meet approximately 2.5% of the total housing needs identified. As a result, the City has placed a higher priority on meeting the needs of households earning between 30% and 80% AMI so that a greater number of housing units can be assisted than would be possible with the much more substantial subsidy demands required to create units affordable to those earning between 0 and 30% AMI. An exception to this approach are projects which directly assist homeless persons in making the transition to permanent housing.

C. PROMOTING HOME OWNERSHIP

In part a response to market conditions, Lowell's Master Plan expresses a clear goal of increasing the rate of homeownership in Lowell's neighborhoods. The City recognizes the value of homeownership in creating and promoting neighborhood stability and cohesion. The 2000 Census reported that the City's homeownership

rate was 43%, nearly 33% below the national average. The City believes that the rate has increased somewhat since 2000, however a large gap remains. In order to continue to improve the City's rate of homeownership, a priority has been placed on addressing the housing needs related to owner-occupied housing. The City will continue to place a high priority on supporting projects which provide first time homebuyers with downpayment assistance and training programs as well as those which create opportunities for new owner-occupied units to be created.

D. SEVERITY OF NEEDS

In addition to the factors identified above, the City recognizes that certain housing needs are more acute than others. Once the other factors identified above are considered, the City will prioritize projects which address those needs that have been documented as the more severe prior to those which are less acute.

4. OBSTACLES TO MEETING UNDERSERVED NEEDS

As discussed above, the City has calculated that \$1.5 billion would be required to address all of the identified housing needs in Lowell. Without question the largest impediment to addressing these needs is the cost of housing production coupled with the limited availability of funds. At the current rate of public and private funding availability for affordable housing activities under current market conditions, the City can address approximately one half of one percent of the total housing need each year. As is discussed in the Barriers to Affordable Housing Production section below, there are few factors influencing the costs of housing production that are within the City's control that have not been ameliorated in recent years. The remaining and more substantial factors are products of the regional housing market and state and federal policies that impact local government revenue generation.

Specific Housing Objectives (91.215 (b))

1. *Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.*
2. *Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.*

3-5 Year Strategic Plan Specific Housing Objectives response:

1. SPECIFIC HOUSING OBJECTIVES

The following table outlines the specific accomplishment goals that the City of Lowell hopes to achieve over the 2005-2010 Consolidated Plan period.

ACTIVITY	ACCOMPLISHMENT UNITS	GOAL
Rental Housing Subsidies	04-Households	20
Construction of Housing	10-Housing Units	20
Direct Homeownership Assistance	04-Households	200
Rehab, Single-Unit Residential	10-Housing Units	20
Rehab, Multi-Unit Residential	10-Housing Units	20
Rehab, Publicly-Owned Residential Buildings	10-Housing Units	10
Energy Efficiency Improvements	10-Housing Units	10

Lead-Based/Lead Hazard Test/Abatement	10-Housing Units (Abated)	200
Homeownership Assistance (not direct)	01-People (Served)	2000

In addition to meeting these accomplishment goals, the City hopes to be able to complete the 53 units remaining to meet Julian D. Steele Replication Plan mandates and achieve a measurable improvement in the rate of home ownership in the City. Finally, in order to reduce the operating costs of the housing units assisted and conserve energy, the City has embraced a policy of requiring that all housing projects supported by Consolidated Plan construction funding must meet Energy Star standards.

Finally, the City has placed a renewed emphasis on strengthening the capacity of Community Housing Development Organizations (CHDOs) operating in Lowell. CHDOs will continue to be particularly instrumental in developing transitional and permanent housing to help reduce the chronically homeless population in the City and in developing affordable housing units consistent with the mandates of the Julian D. Steele Replication Plan. As of March 2005, there are four certified CHDOS operating in Lowell. The City hopes to see this number increase over the next five years.

2. USE OF RESOURCES

Assuming continued level funding of the HOME and CDBG programs, the City of Lowell expects to spend approximately \$8,900,000 of HOME and CDBG funds on affordable housing projects between July 2005 and June 2010. It is anticipated that approximately \$5,000,000 of this will be spent on homeownership projects and the balance will be applied to rental projects.

Based on prior project experience, we anticipate that these funds will be matched at a rate of 3:1 or 4:1 with other public and private funding, including:

- Restoration of the City's Lead Hazard Control Grant in 2005
- Continued funding of permanent housing projects through the McKinney program
- Contributions of HOME funding through the Massachusetts Department of Housing and Community Development to Lowell projects
- Project-based Section 8 certificates through the Lowell Housing Authority
- Low Income Housing Tax Credits
- Historic Preservation Tax Credits
- Project financing at favorable interest rates from the Lowell Development and Finance Corporation and local lenders
- Private contributions to local CHDOs
- Private market real estate investments of local CHDOs
- Market rate housing that subsidizes affordable units on the same development site

Needs of Public Housing (91.210 (b))

In cooperation with the public housing agency or agencies located within its boundaries, describe the needs of public housing, including the number of public housing units in the jurisdiction, the physical condition of such units, the restoration and revitalization needs of public housing projects within the jurisdiction, and other factors, including the number of

families on public housing and tenant-based waiting lists and results from the Section 504 needs assessment of public housing projects located within its boundaries (i.e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25). The public housing agency and jurisdiction can use the optional Priority Public Housing Needs Table (formerly Table 4) of the Consolidated Plan to identify priority public housing needs to assist in this process.

3-5 Year Strategic Plan Needs of Public Housing response:

NEEDS OF PUBLIC HOUSING

SUMMARY OF PUBLIC HOUSING

Occupied Housing Units

There are currently 255 State and 1,639 Federal public housing units in Lowell, all of which are managed by the Lowell Housing Authority (LHA). The following table summarizes these developments within the LHA's jurisdiction.

Lowell Housing Authority Properties

	Elderly	Family	Total
Public Housing-Subsidized Units			
Funding Source:			
State Assisted	190	65	225
Federally Assisted	802	836	1638
Total:	992	901	1893

Source: Lowell Housing Authority

As the table indicates, LHA's housing units are divided almost equally among housing for families and housing for the elderly. As was discussed in the previous section, these sites are located in neighborhoods in close proximity to public transportation, commercial opportunities, and social services.

Section 504 Needs Assessment

The Lowell Housing Authority completed its Section 504 assessment in July 1994, to determine how the LHA can best comply with HUD's handicapped requirements. The assessment was based on a variety of factors including the LHA's waiting list for accessible units. The report concluded that there was a need for less than 5% of all federal units to be accessible for handicapped residents. Currently, of the 1893 units of public housing in the jurisdiction, approximately 4% are accessible for handicapped households.

Characteristics of Families on Waiting Lists

There are 5,059 families on the LHA waiting list for public housing and an additional 332 families on the waiting list for Section 8 vouchers. According to the LHA, 94% of these families have an income of less than or equal to 30% of the area's median income; and the majority of households have children. The majority of families on both the public housing and Section 8 waiting lists are Hispanic (40%) and White (37%).

Federal public housing waiting lists are open for one, two, and five bedroom units with waits as short as 6-12 months for a one bedroom unit, to as long as 3-4 years for a five bedroom unit. The lists for three and four bedroom units have been closed for seven years and are not expected to open within the next PHA Plan Year. Applications for state public housing are accepted for emergencies only and the section 8 wait list is currently closed.

In order to effectively and efficiently accommodate those on its waiting list, the Housing Authority developed the following preference system to rank those seeking housing.

Lowell Housing Authority Preference System

Preference Description	
#	
1	A person/household involuntarily displaced from a dwelling unit in the municipality of Lowell by natural disaster, by fire, by unwarranted landlord action or by Government action, including capital programs of the LHA.
2	A working head of household or working spouse (who has averaged 20 hours of work a week for at least six months), or person 62 years or older, or a person unable to work because of the extent of his/her disability.
3	A legal resident of Lowell, or a person working in Lowell an average of 20 hours a week or more, or a person with a job offer to work in Lowell with a minimum of 20 hours of work a week.
4	A victim of domestic violence who has been relocated as verified by the police.
5	A veteran as verified by the Department of Veteran Affairs.

Source: Lowell Housing Authority's Annual Plan, 2004

PHYSICAL CONDITION OF PUBLIC HOUSING

It is the policy of the LHA to inspect each unit at least once per year. Emergency deficiencies found during the inspection are corrected within 24 hours; routine deficiencies are addressed within two weeks. According to the 2004 LHA Plan, more than \$3.4 million in repairs and upgrades to LHA properties is expected during the plan year including site improvements and upgrades to dwelling equipment.

Housing units, which have occupancy permits, are considered by the City Inspectional Services to be in standard condition. According to LHA, there are currently no substandard public housing units in Lowell. To ensure that existing units remain in standard condition, each housing unit is inspected for code compliance during the turnover process, before being rented to a new household.

RESTORATION AND REVITALIZATION NEEDS

HUD requires public housing authorities to prepare an annual Performance and Evaluation Report, detailing the progress made by the agency in meeting its modernization goals and activities planned for the future. According to summaries of the Performance and Evaluation Reports of the past five years, LHA has dedicated many of its resources to upgrading units throughout its jurisdiction, including the conversion of 12 units into handicapped accessible units, roof replacements, replacement of dwelling equipment (stoves, refrigerators, air conditioning), and

general outdoor site improvements. More than \$3.4 million for federal FY 2004 is earmarked for similar improvements citywide during the next Plan Year.

Public Housing Strategy (91.210)

1. *Describe the public housing agency's strategy to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the public housing agency (including families on the public housing and section 8 tenant-based waiting list), the public housing agency's strategy for addressing the revitalization and restoration needs of public housing projects within the jurisdiction and improving the management and operation of such public housing, and the public housing agency's strategy for improving the living environment of extremely low-income, low-income, and moderate families residing in public housing.*
2. *Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake to encourage public housing residents to become more involved in management and participate in homeownership. (NAHA Sec. 105 (b)(11) and (91.215 (k))*
3. *If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation. (NAHA Sec. 105 (g))*

3-5 Year Strategic Plan Public Housing Strategy response:

1. ADDRESSING PUBLIC HOUSING NEEDS

ADDRESSING THE NEEDS OF LHA RESIDENTS

The LHA works on a regional level to address the needs of extremely low-, low-, and moderate-income families. Expansion of its Section 8 Homeownership program is one activity in particular which the authority hopes will help assist households throughout Greater Lowell. In an effort to offer its tenants more than just affordable housing, LHA provides a variety of social, educational, and recreational activities including youth programs, employment training, and field trips for the elderly. LHA continues to promote partnerships with local organizations to provide quality services to its tenants.

ADDRESSING REVITALIZATION AND RESTORATION NEEDS

According to the LHA Capital Fund Program Five-Year Action Plan, improvements to the Youth Sports Building, elevator upgrades, and upgrades to dwelling equipment are among the priority citywide projects. Upgrades to dwelling units, sprinkler systems, sidewalks and parking, and heating systems are additional projects planned for individual housing developments over the next five years. The LHA has estimated more than \$3.5 million for each year to achieve these goals.

Additionally, the Julian D. Steele Housing Development, a state funded family public housing development, will be replaced with 180 new units. All tenants have been relocated and the buildings demolished. A combination of single-family units and duplexes with project-based Section 8 subsidies are planned for the 20-acre site.

IMPROVING THE LIVING ENVIRONMENT OF LHA RESIDENTS

The Lowell Housing Authority offers programs and activities, which help improve the living environment for low- and moderate-income families living in public housing. These activities are summarized below:

Resident Orientation Committee

In response to requests from resident organizations wanting to participate in orienting new tenants, the LHA established a volunteer resident orientation committee. The role of the committee is to welcome and advise new residents of the rules, procedures, neighborhood activities and available services for families and the elderly relevant to their development.

Drug Elimination Program

Funds are provided to dispatch services for both family and elderly developments. "Family Parenting Program," a family support program was provided at the North Common Village and George W. Flanagan Developments, providing substance abuse prevention services. The youth recreation program offers activities, which help prevent drug abuse among LHA youth. Together these programs enhance the overall security and safety at the housing authority sites.

ROSS Program

Over the past three years, supportive services have been provided through LHA, which encourage elderly/disabled residents to participate in social activities including on-site cafes, health screenings, field trips, and educational programs, improving their overall life experiences.

2. LHA RESIDENT PARTICIPATION

In an effort to address the needs of public housing, the Lowell Housing Authority offers its residents opportunities to become involved in LHA management and policy implementation. LHA also provides a variety of activities aimed at self-sufficiency and homeownership among its residents. These programs are described below:

Tenant Advisory

Each public housing development within the LHA jurisdiction has a Tenant Council. In drafting the Five Year Plan and First Annual Plan in 2000, representatives from each council, along with voucher recipients, were invited to join a Resident Advisory Board, whose chief role was to provide assistance to the Housing Authority in evaluating agency plans and policies.

Community Service Requirements

A requirement of the residential lease signed by all public housing residents of LHA is to participate in the Community Service Program. As part of the program, non-exempt residents are mandated to contribute eight hours per month of community service, participate in eight hours per month of economic self-sufficiency activity, or a combination of the two.

Family Self-Sufficiency Program

The Family Self-Sufficiency Program is designed to foster a holistic approach to self-sufficiency. The FSS Section 8 program recently expanded to include 50 participants and in the past two years three graduates of the FSS program have utilized the program to purchase homes. Other services provided through the

program include: resume development and interviewing techniques, computer training, day care placements, First Time Homebuyers Program, and credit repair/credit establishment.

Also administered through the FSS is a Homeownership Program. The program assists residents of public housing and section 8 participants through the home buying process. According to the 2004 LHA Annual Plan, five section 8 participants utilize the Program.

Recently implemented through the FSS is the Joint Employment Program which provides employment opportunities for public housing residents, and whose goal is to assist residents in obtaining full-time employment and ultimately economic independence.

3. "TROUBLED" DESIGNATION

-Not Applicable-

Barriers to Affordable Housing (91.210 (e) and 91.215 (f))

- 1. Explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.*
- 2. Describe the strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing, except that, if a State requires a unit of general local government to submit a regulatory barrier assessment that is substantially equivalent to the information required under this part, as determined by HUD, the unit of general local government may submit that assessment to HUD and it shall be considered to have complied with this requirement.*

3-5 Year Strategic Plan Barriers to Affordable Housing response:

1. PUBLIC POLICIES IMPACTING THE COST OF HOUSING

Lowell is part of the Greater Boston housing market which has been well-documented as one of the most expensive in the country. The National Low-Income Housing Coalition recently released a study which identified Massachusetts as having the second least affordable rental housing in the nation. The costs of real estate, construction, and homeownership in Eastern Massachusetts all also rank among the highest in the country.

The reasons for the high cost of housing in this area are diverse and complex, but many researchers have identified tax policies and land use regulations and contributing factors. The ability Massachusetts cities and towns to raise local revenues is restricted by the Proposition 2 ½ property tax regulations which limit the rate of growth of local tax levies and discourage communities from accepting additional housing development because of its real and perceived fiscal impacts on municipal budgets. Partially in response to the restrictions of Proposition 2 ½, many municipalities in Massachusetts have enacted strict zoning and other land-use regulations which significantly limit the available development opportunities for low-

cost housing in general and multi-family housing specifically, thereby increasing the costs of producing affordable housing in the region.

2. STRATEGY TO AMELIORATE BARRIERS

Relative to other communities within the Greater Boston housing market, Lowell minimizes these barriers. Property costs in Lowell, although increasing rapidly with the overall market, remain lower than those of all of its neighboring towns and most communities in the region. Property taxes are comparatively low and due in part to the historic diversification of land uses, Lowell is less restricted by Proposition 2 ½ than many of its neighbors.

Nevertheless, the cost of affordable housing production remains extremely high in the Lowell market. As a result, the City of Lowell continues to work to eliminate barriers that may limit the production or feasibility of affordable housing construction that are within the capacity of local government to address. Foremost among these are zoning and land-use regulations. In December of 2004, the Lowell City Council adopted a comprehensive reform of the City's zoning regulations, consistent with the 2003 Master Plan.

Under the new zoning, over thirty-eight percent (38%) of the City's land area is zoned to allow multi-family development in residential or mixed-use zoning districts. The City allows significant density in these zones as described below. Even the most restrictive single-family zone allows more than four units per acre. In addition, the City's Zoning Ordinance allows for accessory dwelling units in single-family zoned areas and encourages the conversion of existing buildings including schools, churches, and obsolete industrial buildings, to multi-family residential uses, even when those buildings are located in single-family zoning districts. In certain urban mixed-use zoning districts required parking is limited to one space per unit, and a by-right waiver for all required parking is provided if the project site is within 1500 feet of a public parking structure.

Maximum Allowable Residential Densities in Lowell Zoning Districts

Zoning District(s)	Proportion of Land Area	Units per Acre
Suburban Multifamily (SMF), Suburban Mixed Use (SMU), & Traditional Two-Family (TTF)	18%	14.5
Traditional Multifamily (TMF), Traditional Mixed Use (TMU), & Neighborhood Business (NB)	9%	17
Urban Multifamily (UMF) & Urban Mixed Use (UMU)	3%	43.5
Downtown Mixed Use (DMU), High Rise Commercial (HRC), and Institutional (INST)	8%	60-120*

*Limited only by floor area ratios.

Source: City of Lowell Zoning Code

Lowell's permit fees and development review process are also some of the least burdensome in the region. The City does not charge development impact fees or technical review fees that are permitted under Massachusetts General Law and places no special permitting reviews on affordable housing projects that would not be required of all developments.

In recent years, the Lowell Planning Board has approved three subdivisions that collectively included one hundred (100) units of affordable housing. In each case, the approval included multiple waivers of the infrastructure design standards for a subdivision that served to reduce the cost of construction. In addition, the Concord Meadows subdivision was approved as a planned residential development, enabling the project to reduce lot area, setbacks, and frontage requirements as well as minimize the infrastructure costs by clustering the building lots with shorter utility runs and roadways, while providing communal open space resources for the residents of this mixed income project.

In the past five years alone, Lowell has issued building permits for 250 new units of multi-family housing and 152 new units in two-family buildings citywide as well as the creation of 844 new units through the adaptive reuse of existing buildings primarily in the downtown, a majority of which are affordable to families earning 80% of the area median income or less*. Over 300 more units are presently in the permitting process. In summary, while the cost of housing development remains a major impediment to affordable housing production, the City of Lowell has taken significant steps to minimize the role that public policies at the local level have in exacerbating this challenge. As stated in the City's Master Plan, Lowell also actively supports statewide efforts to encourage other communities to expand their housing production, recognizing that the overall market forces associated with an increase in regional housing supply will improve housing affordability in Lowell.

HOMELESS

Homeless Needs (91.205 (b) and 91.215 (c))

Homeless Needs— The jurisdiction must provide a concise summary of the nature and extent of homelessness in the jurisdiction, (including rural homelessness where applicable), addressing separately the need for facilities and services for homeless persons and homeless families with children, both sheltered and unsheltered, and homeless subpopulations, in accordance with Table 1A. The summary must include the characteristics and needs of low-income individuals and children, (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered. In addition, to the extent information is available, the plan must include a description of the nature and extent of homelessness by racial and ethnic group. A quantitative analysis is not required. If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates.

3-5 Year Strategic Plan Homeless Needs response:

1. HOMELESS NEEDS

A point-in-time count of the homeless population in Lowell was conducted in 2004. This enumeration identified 176 individuals and 145 persons in families with children as homeless within the jurisdiction, including both sheltered and unsheltered populations. Of these, 108 were identified as chronically homeless. The table below outlines those identified by this survey.

* Assumes median condominium sale price of \$168,750 and a 6% 30- year mortgage with 5% down.

Homeless Population	Sheltered		Unsheltered	Total
	Emergency	Transitional		
1. Homeless Individuals	88 (N)	47 (N)	41 (N)	176 (N)
2. Homeless Families with Children	12 (N)	46 (N)		58 (N)
2a. Persons in Homeless Families with Children	33 (N)	112 (N)		145 (N)
Total (lines 1 + 2a)	133 (N)	205 (N)	41 (N)	379 (N)
Homeless Subpopulations	Sheltered		Unsheltered	Total
1. Chronically Homeless	67 (N)		41 (N)	108 (N)
2. Seriously Mentally Ill	99 (N)			
3. Chronic Substance Abuse	91 (N)			
4. Veterans	45 (N)			
5. Persons with HIV/AIDS	5 (N)			
6. Victims of Domestic Violence	17 (N)			
7. Youth (under 18 years of age)	79 (N)			

In 2004 the Stabilized Housing for Individuals and Families in Transition (SHIFT) initiative, a locally driven state program, enabled 44 families in Lowell's jurisdiction to moved from hotel/motel emergency housing to permanent housing with supportive services. Many of these families were experiencing severe economic challenges not earning nearly enough to sustain permanent housing and costs associated with food, medical care, transportation, utilities, etc.

This program provides supportive and rental subsidies for 12 months ending July 1, 2005. At that time, if funding for the program is not continued and if the freeze on Section 8 housing vouchers is not lifted, these families will have to manage the cost of market rate housing without supportive services of any kind and may be at risk of becoming homeless, again.

Information regarding the ethnic and racial characteristics of homeless populations in the City of Lowell is not maintained or readily available.

Priority Homeless Needs

1. *Using the results of the Continuum of Care planning process, identify the jurisdiction's homeless and homeless prevention priorities specified in Table 1A, the Homeless and Special Needs Populations Chart. The description of the jurisdiction's choice of priority needs and allocation priorities must be based on reliable data meeting HUD standards and should reflect the required consultation with homeless assistance providers, homeless persons, and other concerned citizens regarding the needs of homeless families with children and individuals. The jurisdiction must provide an analysis of how the needs of each category of residents provided the basis for determining the relative priority of each priority homeless need category. A separate brief narrative should be directed to addressing gaps in services and housing for the sheltered and unsheltered chronic homeless.*

2. A community should give a high priority to chronically homeless persons, where the jurisdiction identifies sheltered and unsheltered chronic homeless persons in its Homeless Needs Table - Homeless Populations and Subpopulations.

3-5 Year Strategic Plan Priority Homeless Needs response:

1. PRIORITY HOMELESS NEEDS

The table below outlines the relative priorities of various categories of homeless needs within the Continuum of Care for consolidated plan program funding. Categories identified as "High" priorities are those for which funding will be provided over the next five years for the support of existing initiatives and programs as well as for new projects. Categories noted as "Medium" priorities will be funded to maintain and continue existing operations, but funds may not be available for new projects or programs to address these needs. All ratings and funding plans are based on the assumption of level funding of all consolidated plan programs over the next five years.

HOUSING CONTINUUM CATEGORY	INDIVIDUALS	FAMILIES	FUNDING SOURCE
Emergency Shelter	MEDIUM	MEDIUM	ESG, CDBG
Transitional Housing	MEDIUM	MEDIUM	ESG, CDBG, HOPWA
Permanent Supportive Housing	HIGH	HIGH	HOME
Chronically Homeless	HIGH	HIGH	ESG, CDBG, HOME

In addition to these specified categories, Lowell's Continuum of Care (CoC) Homeless Assistance programs identified the following activities as core priorities:

- Construct permanent supportive housing for homeless persons with disabilities,
- Support CoC renewal programs that include individual and family emergency and transitional shelters,
- Support domestic violence emergency and transitional shelters,
- Develop a homeless information management system, and
- Conduct a major outreach program.

The jurisdiction is also working with the SHIFT initiative and Commonwealth of Massachusetts to create an Early Warning System to help prevent individuals and families from becoming homeless. The Early Warning System will work with utility, banking and property managers to encourage them to contact SHIFT program representatives when residents/customers are in danger of defaulting on mortgage/rental and/or utility charges. In this way, SHIFT case managers and financial agents can work with individuals and families to help stabilize their risk of becoming homeless and keep them in their homes. The successful development of this initiative is also a high priority for the jurisdiction.

Process Basis for Developing and Determining Relative Priorities

The City of Lowell Continuum of Care planning and project selection process established priority homeless needs identified in this plan. This process included public notice of solicitations for project proposals and needs. A community-based

advisory committee using objective rating and review criteria established by HUD for the Continuum of Care reviewed submitted proposals. The ten-member committee currently includes representatives from the Lowell Small Business Assistance Center, Regional Interfaith Council of Churches, Greater Lowell Chamber of Commerce, Lowell Community Health Center, Downtown Lowell Business Association, the City of Lowell, Paul Fireman Fund, Lowell National Historical Park, Merrimack Valley Housing Partnership, and the Mental Health Association of Greater Lowell.

The largest gaps between currently available services and needs identified through the Continuum of Care outreach and planning efforts are in the area of permanent supportive housing. This category is therefore a top priority for supporting new initiatives. The Continuum of Care planning observed that existing facilities generally meet the identified needs for emergency shelter and transitional housing. However, if the existing facilities do not continue to receive support through the consolidated plan programs, there is a danger that services may be reduced below the needs in these areas as well.

2. CHRONIC HOMELESSNESS

As part of a larger initiative to end chronic homelessness within 10 years, Lowell has given high priority to developing permanent supportive housing for chronically homeless individuals. Two of the jurisdictions' four Federally funded, Supportive Housing Program sponsors are targeted to chronically homeless persons with disabilities.

Homeless Inventory (91.210 (c))

The jurisdiction shall provide a concise summary of the existing facilities and services (including a brief inventory) that assist homeless persons and families with children and subpopulations identified in Table 1A. These include outreach and assessment, emergency shelters and services, transitional housing, permanent supportive housing, access to permanent housing, and activities to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless. The jurisdiction can use the optional Continuum of Care Housing Activity Chart and Service Activity Chart to meet this requirement.

3-5 Year Strategic Plan Homeless Inventory response:

1. HOMELESS INVENTORY

The tables below document the inventory of facilities and services available to assist homeless individuals and families with children as identified above.

Emergency Shelter

Provider Name	Facility Name	Target Population 2004 year-round Units/Beds					2004 All Beds		
		A	B	Family Units	Family Beds	Individual Beds	Year- Round	Seasonal	Overflow Voucher
Current Inventory									
Alternative House	Alternative House	M	DV	6	19	3	22		
Lowell Transitional Living Center	Lowell Transitional Living Center	SMF	N/A			90	90	20	
Community Teamwork, Inc.	Millie's House (Pawtucket House)	FC	N/A	6	22	0	22		

SUBTOTAL				12	41	93	134	20	
Under Development									
There are no Emergency Shelter projects under development									

Transitional Housing

Provider Name	Facility Name	Target Population 2004 year-round Units/Beds					2004 All Beds		
		A	B	Family Units	Family Beds	Individual Beds	Year- Round	Seasonal	Overflow Voucher
Current Inventory									
House of Hope, Inc.	House of Hope, Inc	FC	N/A	18	51		51		
Catholic Charities of Merrimack Valley	Brigids Crossing	YMF	N/A	7	16		16		
Community Teamwork, Inc.	SSTAP Program	FC	N/A	14	39		39		
Justice Resource Center	GRIP Program	YMF	N/A			13	13		
Lowell House, Inc.	Recovery House	SMF	N/A			18	18		
Middlesex No. Resource Ctr.	Harvard House	SMF	N/A			8	8		
Middlesex No. Resource Ctr.	New Horizons	SMF	N/A			6	6		
Middlesex No. Resource Ctr.	Parker House	SMF	N/A			8	8		
Community Teamwork, Inc.	Merrimack House	FC	N/A	6	22		22		
U.S. Dept. Veterans Affairs	Crescent House	SM	VET			42	42		
Alternative House	Mary Rita	M	DV	6	20	2	22		
SUBTOTAL				51	148	97	245		
Under Development									
There are no Transitional Housing projects under development									

Permanent Supportive Housing

Provider Name	Facility Name	Target Population 2004 year-round Units/Beds					2004 All Beds		
		A	B	Family Units	Family Beds	Individual Beds	Year- Round	Seasonal	Overflow Voucher
Current Inventory									
Catholic Charities of Merrimack Valley	Julie House	SMF	AIDS			8	8		
Community Teamwork	SHIFT Program	FC	N/A	60	132		132		
Chelmsford Housing Authority	75 Voucher Program for Lowell	SMF	N/A			75	75		
Middlesex No. Resource Ctr.	35 Voucher Program	SMF	N/A			35	35		
Middlesex No. Resource Ctr.	Pathfinder Safe Haven	SMF	N/A			12	12		
Middlesex No. Resource Ctr.	Columbus Supportive Living Program	SMF	N/A			30	30		
Middlesex No. Resource Ctr.	New Horizons	SMF	N/A			4	4		
Middlesex No. Resource Ctr.	Parker House	SMF	N/A			2	2		
DMH Scattered Housing	SMI Housing	SMF	N/A			14	14		

Mental Health Association of Greater Lowell	Coburn School	SMF	N/A			10	10		
Mental Health Association Greater Lowell	Astor Street	SMF	N/A			9	9		
201 Middlesex Street	SRO	SM	N/A			43	43		
Lowell Housing Authority	Shelter Plus Care	SMF	N/A			8	8		
SUBTOTAL				60	132	250	382		
Under Development									
Lowell Transitional Living Center	Permanent Supportive Housing	SMF	N/A			12	12		
House of Hope, Inc.	New Hope Apartments	FC	N/A	10			10		
Middlesex North Resource Center	Pathfinder Apartments	SM	N/A			8	8		
SUBTOTAL				10	0	20	30		

Homeless Strategic Plan (91.215 (c))

1. *Homelessness— Describe the jurisdiction's strategy for developing a system to address homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section). The jurisdiction's strategy must consider the housing and supportive services needed in each stage of the process which includes preventing homelessness, outreach/assessment, emergency shelters and services, transitional housing, and helping homeless persons (especially any persons that are chronically homeless) make the transition to permanent housing and independent living. The jurisdiction must also describe its strategy for helping extremely low- and low-income individuals and families who are at imminent risk of becoming homeless.*
2. *Chronic homelessness—Describe the jurisdiction's strategy for eliminating chronic homelessness by 2012. This should include the strategy for helping homeless persons make the transition to permanent housing and independent living. This strategy should, to the maximum extent feasible, be coordinated with the strategy presented Exhibit 1 of the Continuum of Care (CoC) application and any other strategy or plan to eliminate chronic homelessness. Also describe, in a narrative, relationships and efforts to coordinate the Conplan, CoC, and any other strategy or plan to address chronic homelessness.*
3. *Homelessness Prevention—Describe the jurisdiction's strategy to help prevent homelessness for individuals and families with children who are at imminent risk of becoming homeless.*
4. *Institutional Structure—Briefly describe the institutional structure, including private industry, non-profit organizations, and public institutions, through which the jurisdiction will carry out its homelessness strategy.*
5. *Discharge Coordination Policy—Every jurisdiction receiving McKinney-Vento Homeless Assistance Act Emergency Shelter Grant (ESG), Supportive Housing, Shelter Plus Care, or Section 8 SRO Program funds must develop and implement a Discharge Coordination Policy, to the maximum extent practicable. Such a policy should include "policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons." The jurisdiction should describe its planned activities to implement a cohesive, community-wide Discharge*

Coordination Policy, and how the community will move toward such a policy.

3-5 Year Homeless Strategic Plan response:

1. HOMELESSNESS STRATEGY

The City of Lowell's Division of Planning and Development (DPD) is the lead entity and the applicant for the Continuum of Care (CoC). There is a staff position dedicated to organizing the CoC planning and subcommittee meetings, grant submittals, and program initiatives. Additional, development and finance specialists from DPD assigned to the CoC program include: Deputy Director of Planning and Development, Senior Finance Officer, Account Office Manager, Housing Program Manager, Construction Manager, Assistant City Solicitor and the Director of the Lead Hazard Control Program.

CoC Planning Structure

For 24 years, Lowell's network of human service organizations, public agencies and non-profit providers have worked together on issues of hunger and homelessness. The current Continuum of Care Planning Committee is comprised of 12 committed members that include staff from the DPD, Renewal Community, housing authority, homeless providers, relevant state mainstream agencies including the Massachusetts Department of Mental Health (DMH) and Department of Transitional Assistance (DTA - Welfare), stakeholders, law enforcement, business and community leaders. These 12 represent over 100 individuals—many of whom participate on CoC subcommittees. They include representatives from: State, Federal and local governmental agencies, faith-based and community-based organizations, law enforcement, educational, medical and correctional institutions, business, legal, housing and construction specialist, workforce development agencies, youth, veteran and elderly programs, refugee and minority communities, stakeholders and other interested persons. In addition, the CoC has initiated an electronic newsletter, which is sent to over 300 federal, state and local members of the Lowell's extended Continuum of Care System.

In addition to the Planning Committee there are five (5) other Continuum of Care Committees. They include:

Housing Subcommittee

This committee was created to develop new permanent supportive housing projects for homeless individuals and families; and to keep current projects on track. The mission of this subcommittee has been expanded to include: housing and supportive services that may be needed in each stage of process of preventing homelessness, outreach/assessment, emergency shelters and services, transitional housing, and helping homeless persons (especially the chronically homeless) make the transition to permanent housing and independent housing and independent living; the development of an "Early Warning" homeless prevention system and the movement of families and individuals from hotels and motels to permanent housing with supportive services. Projects include:

- ***SHP Permanent Supportive Housing Projects for People with Disabilities:*** Lowell Transitional Living Center's (LTLC) 12-unit project for chronically homeless individuals (this project is adjacent to LTLC's 90-bed shelter, case management services, medical clinic and kitchen facilities. This development is designed to create micro-permanent supportive housing continuum for chronically homeless individuals—helping them to make the

transition from shelter to permanent housing); the House of Hope's 10, 2-3 bedroom family units to be completed in 2004-2005; and Pathfinder/Safe Haven's 8-unit project for mentally ill and hard to house chronically homeless individuals from Pathfinder's Safe Haven is due for completion in 2006-2007. (This project also creates a continuum of housing and supportive services on site.)

- **New Housing Tenant Selection Advisory Committee:** To develop Tenant Selection guidelines and protocols for the three new housing projects.
- **Community Teamwork's Stabilized Housing for Individuals and Families in Transition (SHIFT)** is implementing a flexible grant program designed to move individuals and families out of hotels and into permanent housing with comprehensive case management and other supportive services. The SHIFT approach also emphasizes prevention and is working with landlords and utilities companies to create innovative solutions to end homelessness.
- **Community Teamwork, Inc.'s YouthBuild program,** has completed one multi-family project and the second a 3-family project is underway.
- **Habitat for Humanity** has recently completed six projects and is working with the City to identify new opportunities.
- **Alternative House's** 2004 Supportive Housing Program project to develop six 2- and 3-bedroom units for families suffering the affects of domestic abuse.
- **The Commonwealth's new Residential Assistance for Families in Transition (RAFT)** 12-month pilot program which provides a onetime payment of \$3,000 for first and last month rent, moving expenses, utility payments or other uses to enable a family to retain its housing.

Building Community Partnerships Subcommittee

To develop new partnerships with local government, business, and educational institutions to create employment and training opportunities for homeless individuals. This subcommittee oversees the:

- **Maintenance Program:** this initiative has secured re-entry employment opportunities for homeless youth and individuals from throughout the Greater Lowell Area.
- **Substance Abuse Diversion Initiative of Lowell:** Working with the Lowell Police Department, the Massachusetts Court System and Lowell House, Inc., this volunteer program diverts individuals from the point of incarceration to treatment.
- **Lowell City Council Subcommittee on Human Services:** Working to schedule presentations to the subcommittee with Continuum of Care housing and service providers; and coordinating joint fundraising efforts.

Homeless Management Information System Subcommittee (HMIS)

The HMIS subcommittee acts as liaison to CSP Tech at the Center of Social Policy, John W. McCormack Institute of Public Affairs at the University of Massachusetts Boston and the Commonwealth of Massachusetts' Interagency for Housing and Homelessness. This Committee oversees the development of the Continuum's HMIS information and referral system.

Hunger/Homeless Commission Subcommittee (HHS)

Hunger/Homeless Commission (HHC), a commission under the authority of legislation enacted by the Commonwealth of Massachusetts, in cooperation with CoC members.

- Directs a comprehensive local response to the needs of those at risk of becoming homeless including emergency housing needs, fuel assistance, and food.
- Acts as a citywide clearinghouse for information to assist local agencies, groups and individuals in securing appropriate services; takes the lead on all issues related to political advocacy and community education.
- The Hunger Homeless Commission initiated a new "Wish List" website, matching homeless providers with donations of clothes, food and furniture. There is also a "volunteer" opportunity page.
- Organizes the City of Lowell Hunger and Homeless Week activities including the annual Walk for Hunger, legislative breakfast, and spaghetti supper. The HHC also organizes candidate's night for local and statewide elections.

Ending Chronic Homelessness Committee (ECHS)

The ECHS continues to focus on addressing the goal of ending chronic homelessness by 2012 by following the U.S. Department of Health and Human Services model to:

- Develop the City of Lowell's 10-year plan to end homelessness.
- Define the population experiencing chronic homelessness and itemizing service needs;
- Analyze the response of Lowell's CoC and relevant mainstream programs to the itemized needs;
- Identify outcomes and objectives that would improve the CoC and mainstream program responses to long-term and repeated homelessness;
- Offer actions that the CoC and mainstream agencies could take that would contribute to reducing and ending chronic homelessness; and

Renewal Community Subcommittee (RCS)

The RCS working with Abt Associates, Inc. continues to be one of the leaders of Lowell's Renewal Community (RC) team which, in the second year of the designation, has awarded over \$5 million in federal tax incentives to developers of commercial projects in the high-poverty RC area. Current projects that this subcommittee oversees include:

- Lowell's CoC providers, working with Abt Associates, Inc. and the City of Lowell have recently executed a Phase II contract with Abt to provide case studies relating to customized workforce development strategies and tax incentive instruments to reduce work to poverty and increase development in the Lowell's Renewal Community.
- As per the requirements of the RC designation, work with the workforce investment board to increase employment opportunities for difficult to employ individuals living in RC areas.
- Work with businesses located in the RC area to introduce them to RC employment tax benefits for employing RC residents.

Strategy for Helping Those At Risk of Becoming Homeless

As mentioned above, the jurisdiction is working with the SHIFT Coalition and Commonwealth of Massachusetts to create an Early Warning System to help prevent individuals and families from becoming homeless. The Early Warning System will work with utility, banking and property managers to encourage them to contact SHIFT program representatives when residents/customers are in danger of defaulting on mortgage/rental and/or utility charges. In this way, SHIFT case managers and financial agents can work with individuals and families to help stabilize their risk of becoming homeless and keep them in their homes. The assistance to these families

can include but is not limited to: case management; financial management and organization; grants to pay outstanding bills (mortgage/rent and utilities); fuel assistance; home modification; medical care; transportation, etc.

2. CHRONIC HOMELESSNESS

The following is the multi-step strategy that has been developed by the City of Lowell's Continuum of Care to end chronic homelessness and assist persons in making the transition to permanent housing and independent living.

1. City Manager announces plans to create a 10-year plan to end homelessness.
2. Lowell Transitional Living Center's 12-unit permanent housing project for chronically homeless individuals secures total funding for the project and will to be completed later in 2005.
3. In 2003, Middlesex North Resource Center's Pathfinder Safe Haven was awarded funding for 8 units of permanent housing for chronically homeless individuals. The project is estimated to be completed in 2006.
4. The House of Hope has completed 10 units of permanent housing for homeless families.
5. HMIS Phase I has 8 homeless providers using the ServicePoint web-based tracking system. With a \$30,000 funding commitment from the 2003 homeless assistance award, matched by a \$10,000 commitment from the City of Lowell, Phase II, designed to customize reports and analysis, enhance local strategic development—ending duplication of services and better evaluating in more detail—the current population as well as the federal, state and local response to chronic homelessness, is currently in process.
6. Community Teamwork's Stabilized Housing for Individuals and Families in Transition (SHIFT) is implementing a flexible grant program designed to move individuals and families out of hotels and into permanent housing with comprehensive case management and other supportive services.
7. The SHIFT Coalition is also in the process of creating an "early warning" system that emphasizes prevention. The team is working with state officials, the local CAP agency, landlords and utility companies to create a system that can provide CoC support agencies with information and innovative solutions to end homelessness and reduce recidivism.
8. The Division of Planning and Development is working to certify Community Housing Development Organizations and provide HOME funds to them to construct housing units that are affordable for households earning between zero and fifty percent of the area median income. These units will provide additional housing options for currently homeless individuals and families.

Coordination of Efforts to End Chronic Homelessness

The lead entity for the Consolidated Plan programs, the City of Lowell's Division of Planning and Development (DPD) is also the lead entity and the applicant for the Continuum of Care. In addition, Lowell's Continuum of Care participates as part of the Commonwealth of Massachusetts' statewide Continuum of Care Planning Committee (State CoC). The lead entity for the State CoC is the Commonwealth's Interagency for Housing and Homelessness (ICHH). Working in cooperation with the

ICCH and the State CoC, the City of Lowell coordinates local efforts with statewide initiatives to address the national priority of ending chronic homelessness.

The coordination strategy to date includes the creation of a Homeless Management Information System (HMIS) created by the State of Massachusetts that will include all HUD funded and non-HUD funded emergency shelters, transitional housing and permanent supportive housing programs. The state HMIS is under currently under construction and will be operational in July of 2005. In addition coordinated efforts are ongoing to end chronic homelessness and create early warning systems that can help prevent those at risk of becoming homeless to stay in their homes; and state institutional discharge policies that will eliminate discharges to emergency homeless shelter programs.

3. HOMELESSNESS PREVENTION

As mentioned above, the jurisdiction is working with the SHIFT Coalition and Commonwealth of Massachusetts to create an Early Warning System to help prevent individuals and families from becoming homeless. SHIFT case managers and financial agents can work with individuals and families to help stabilize their risk of becoming homeless and keep them in their homes. The assistance to these families can include and not limited to: case management; financial management and organization; grants to pay outstanding bills (mortgage/rent and utilities); fuel assistance; home modification; medical care; transportation, etc.

4. INSTITUTIONAL STRUCTURE

The City of Lowell Division of Planning and Development acts as the lead agency for the City of Lowell's homelessness strategies. Partners in this effort include:

AIDS Action Committee	Lowell Continuum of Care
Alternative House	Lowell Housing Authority
Bedford Veterans Affairs Office	Lowell Transitional Living Center, Inc.
Cambridge Cares About AIDS	Massachusetts Dept. of Transitional Assistance
Catholic Charities of the Merrimack Valley	Massachusetts Dept. of Mental Health
Chelmsford Housing Authority	Mental Health Assoc of Greater Lowell
City of Lowell DPD	Metropolitan Boston Housing Partnership
City of Lowell Health Department	Middlesex North Resource Center
City of Lowell Hunger/Homeless Commission	Pathfinder
Community Teamwork, Inc	SHIFT Coalition
Greater Lowell Interfaith Coalition	Southern Middlesex Opportunity Council
House of Hope Inc.	St. Julie Asian Center
Justice Resource Institute	Tri-City Community Action Program
Lowell Community Health Center	U.S. Dept. of Veterans Affairs

5. DISCHARGE COORDINATION POLICY

The Commonwealth has worked and continues to work to develop effective policies to prevent discharge from institutions and health care facilities that result in homelessness.

One of the ways in which the Commonwealth provides for appropriate discharge planning across programs is the inclusion of discharge specifications in contracts. The state's Operational Services Division, the agency responsible for overseeing the Massachusetts Purchase of Service system has developed discharge planning specifications for certain requests for proposals (the method for state procurement of services including all human services). The language aims to ensure consistency in discharge planning among vendors and to establish an effective discharge planning policy and system statewide.

Individual departments have worked to ensure appropriate discharge planning internally as well. Since 1983, the Department of Mental Health, for example, has adhered to an inpatient discharge planning policy that includes housing search among other measures, and is explicitly aimed at preventing homelessness. The policy prohibits DMH state hospitals and community mental health centers from electing to discharge clients from inpatient units with directions to seek housing or shelter in an emergency shelter. It directs staff to make every effort to place clients in suitable, affordable housing coupled with clinically appropriate services.

Successful efforts have also been made to ensure appropriate discharge from privately contracted mental health and substance abuse services. The Massachusetts Behavioral Health Partnership (MBHP) is a private, for profit managed care organization that has contracts to manage mental health care and substance abuse services for over 500,000 low-income individuals. In FY98, the Commonwealth added performance standard in contract with MBHP to improve aftercare. In 1999, a performance standard was added in the contract specifically to improve discharge planning of homeless individuals. MBHP, in turn, has adopted discharge planning protocols, provided training and developed informational resources in order to fulfill this contract obligation.

The Department of Corrections has developed system-wide policies and practices to encourage the discharge of offenders to appropriate housing or placements. As soon as an offender enters the corrections system, a needs assessment is conducted. This assessment forms the basis for the study and work the individual will do while incarcerated to prepare the individual for a successful discharge. One year prior to release, offenders attend a transition workshop; the workshop addresses all aspects of the transition back into the community including housing. Prior to release, the individual's transition plan is reviewed by a multi-disciplinary team. A case manager facilitates the transition to a Community Resource Center once the individual is released. Many resources are offered to ex-offenders; whether or not the individual avails themselves of these resources is determined by the individual alone unless the individual is under supervision after incarceration.

The Department of Social Services is in the process of reviewing its discharge planning policies to improve discharge planning from foster care and other youth facilities. The draft Permanent Planning Policy recommends changes to discharge planning, reinforcing Foster Care Review staff's involvement in focusing all involved with youth on planning for discharge and/or accepting a VPA to remain in custody until age 18. The agency has a Discharge Support Program that provides youth leaving DSS without returning home or being adopted up to \$1,500 in funds to pay for housing and related expenses. The agency also has each youth meet with an Outreach worker to assist with discharge planning including the completion of a Mass Health application. Youth leaving DSS also receive a Leaving Care packet that

includes a Discharge Guide, a \$50 gift card to a grocery store in the appropriate area, \$25 phone card and a \$50 gift certificate to a clothing or department store.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

3-5 Year Strategic Plan ESG response:

-Not Applicable-

COMMUNITY DEVELOPMENT

Community Development (91.215 (e))

1. *Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), – i.e., public facilities, public improvements, public services and economic development.*
2. *Describe the basis for assigning the priority given to each category of priority needs.*
3. *Identify any obstacles to meeting underserved needs.*
4. *Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.*

NOTE: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

3-5 Year Strategic Plan Community Development response:

1. PRIORITY COMMUNITY DEVELOPMENT NEEDS

Consistent with the City of Lowell's Master Plan, the city's core community development needs are those activities which help to cultivate economic opportunities through participation in the creative economy, improve the quality of life in the neighborhoods, and promote the Lowell as a Lifetime City. With these conceptual goals in mind, the City of Lowell anticipates using Community Development Block Grant (CDBG) funding to support programs to:

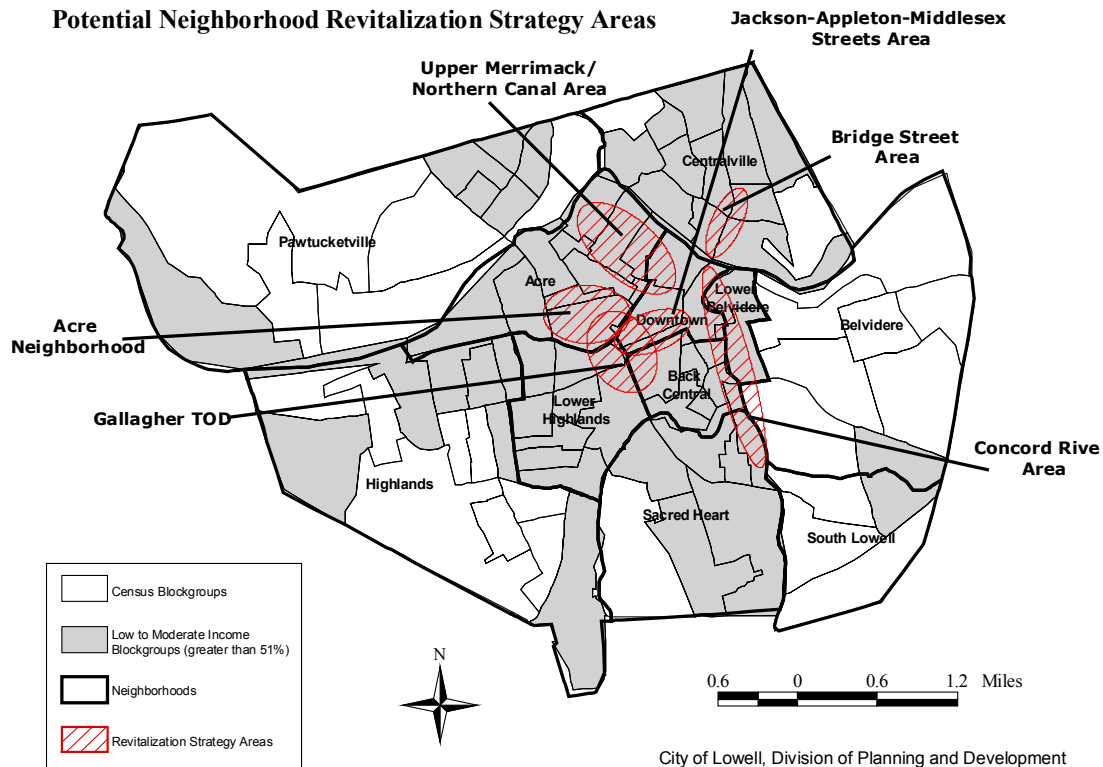
1. Help insure that Lowell can be a "Lifetime City," particularly for those for whom the affordability of housing is a primary impediment. CDBG and other funds will be used to support the production, rehabilitation, and deleading of housing as well as public services aimed at youth, the elderly, and other underserved classes, to supplement basic housing in creating a stable and desirable community for people of all ages particularly at the low- and

moderate-income levels. Priority will also be placed on developing and supporting facilities for seniors and youth that provide social and other benefits to these age cohorts.

2. Provide training, education, and employment opportunities to help expand Lowell's workforce particularly by lifting low- and moderate-income residents into stronger positions in the evolving economy. Particular emphasis will be placed on programs that cultivate entrepreneurship and microenterprise as well as those that create opportunities for larger-scale job creation through site assembly, environmental remediation, historic preservation, building rehabilitation, infrastructure development, technical assistance, and assistance to businesses.
3. Strengthen, preserve, and enhance the physical character of and quality of life in Lowell's neighborhoods, including the housing stock, and the public infrastructure and facilities, with particular emphasis on the low- and moderate-income neighborhoods, designated urban renewal areas, and those areas that benefit all residents of this primarily low- and moderate-income City. Priorities will be placed on projects that improve streets and transportation infrastructure, install sidewalks and provide for pedestrian safety, redevelop parks, plant trees, and create new parking facilities in these neighborhoods. In addition, code enforcement for existing residential buildings will be emphasized, so deteriorating properties do not have a detrimental influence on the neighborhoods. Finally, homeownership programs will be supported to help improve community stability by increasing homeownership rates in Lowell.
4. Continue to build the capacity of residents to empower themselves to help strengthen their community, address problems, and develop pride in their City. Public service activities that strengthen neighborhood organizations, provide employment, skills, and homebuyer training, and offer leadership opportunities to youth will be emphasized.

Consistent with these priorities, the City of Lowell anticipates designating one or more low- and moderate-income areas as Neighborhood Revitalization Strategy Areas (NRSA), so that these initiatives can be more clearly focused and directed toward key target neighborhoods of the City where needs are most clearly defined. Following further neighborhood planning efforts in 2005 and 2006, NRSA designation may be sought for one or more of the locations listed in the table below. All of these locations possess the required 70% or greater low- and moderate- income population as follows.

Neighborhood	Block Groups	LMI Population
Jackson, Appleton, Middlesex Streets	3101.1, 3101.2, & 3119.3	76.0%
The Acre Neighborhood	3111.1 & 3111.2	73.5%
The Bridge Street Neighborhood	3102.3, 3103.2, & 3104.3	72.5%
Upper Merrimack Street/Northern Canal	3101.3, 3108.1, 3108.2, 3110.1, & 3110.3	88.7%
The Concord River Neighborhood	3101.1, 3119.1, 3120.1, 3121.1, 3124.1, & 3124.2	70.1%
Gallagher Transit-Oriented Development	3101.1, 3101.2, 3111.2, 3112.1, 3118.3, 3119.3, & 3120.3	77.0%



2. BASIS FOR ASSIGNING PRIORITIES

The priorities for individual Community Development needs identified in this plan are derived from the input obtained from numerous outreach efforts, surveys, and consultations used to identify community needs and establish this Consolidated Plan's priorities. Prioritization also takes into consideration feasibility of projects, impact of the costs of larger projects on other priorities, the anticipated funding levels for the CDBG program, and other sources of funding that may be available to address established needs.

Activities which are labeled as "High" priorities in the tables below and elsewhere in this plan are those which will receive Consolidated Plan funding assuming level funding of the City's formula grants over the next five years. Activities which are identified as "Medium" priorities are those which will likely receive Consolidated Plan funding if the applicable formula grants to the City of Lowell are increased during the next five years and may also receive funds if particularly strong projects are identified. Activities that receive a "Low" priority will not receive Consolidated Plan funding over the next five years without an amendment to this Consolidated Plan.

A "Low" rating does not necessarily diminish this importance of these activities or indicate that there is no need for them in Lowell. Many activities that are assigned a "Low" priority for CDBG funding are nevertheless important needs for the community or high priorities for other sources of funding. Some activities receive "Low" ratings if

the funds that are potentially available under the Consolidated Plan programs would be insufficient to have a meaningful impact on these needs or adequately funding them would result in minimal output or outcome accomplishments relative to the amount of funds expended at the expense of other priority programs. An example is Sewer system improvements, where the City has identified over \$200 million worth of improvements that are needed to address a combined sewer overflow problem.

Activities for which a matrix code has been assigned but are not listed in the table below are either not applicable to Lowell or have not been identified as a priority need to be supported by Consolidated Plan funds over the next five years.

The following chart identifies the relative priority of community development activities identified for the July 2005 through June 2010 consolidated plan period. Planning, program administration, and HOPWA-specific activities have not been included in this chart.

ACTIVITY	MATRIX CODE	PRIORITY	FUND SOURCE
A. LIFETIME CITY			
Acquisition of Real Property	01	High	CDBG, City
Disposition of Real Property	02	High	CDBG, City
Senior Centers	03A	Medium	CDBG, City, State
Youth Centers	03D	High	CDBG, Private
Child Care Centers	03M	High	CDBG, Private
Health Facilities	03P	Medium	CDBG, State, Private
Abused and Neglected Children Facilities	03Q	Low	State, Private
Operating Costs Homeless/AIDS Programs	03T	High	ESG, HOPWA, State, Private
Senior Services	05A	High	CDBG, City
Handicapped Services	05B	High	CDBG, State, Private
Fair Housing Activities	05J	Low	Private
Screening Lead-Based Paint/Lead Hazards	05P	Medium	CDBG, other Federal
Rental Housing Subsidies	05Q	High	HOME, State, other Federal
Security Deposits	05T	Low	Private
Removal of Architectural Barriers	10	Medium	CDBG, City
Construction of Housing	12	High	HOME, Private
Direct Homeownership Assistance	13	High	HOME, City, Private
Rehab, Single-Unit Residential	14A	High	CDBG, HOME, Private
Rehab, Multi-Unit Residential	14B	High	CDBG, HOME, Private
Public Housing Modernization	14C	Low	State, other Federal
Rehab, Publicly-Owned Residential Buildings	14D	High	HOME
Energy Efficiency Improvements	14F	High	HOME
Rehabilitation Administration	14H	High	CDBG, HOME, City, Private
Lead-Based/Lead Hazard Test/Abatement	14I	High	CDBG, other Federal
B. ECONOMIC DEVELOPMENT			
Clearance and Demolition	04	High	CDBG, City
Clean-up of Contaminated Sites	04A	High	CDBG, Other

			Federal, City
Relocation	08	High	CDBG, State, City
Rehab Commercial/Industrial Buildings	14E	High	CDBG, City, Private
Acquisition – for Rehabilitation	14G	Medium	CDBG, City, State
Non-Residential Historic Preservation	16B	Medium	CDBG, Private
Commercial/Industrial Land Acquis./Dispos.	17A	High	CDBG, City
Commercial/Industrial Infrastructure Development	17B	Medium	CDBG, State, City
Com./Ind. Bldg Acquis., Construct., Rehab.	17C	High	CDBG, State, City
Direct Financial Assistance to For-Profits	18A	High	CDBG, State, Private
ED Technical Assistance	18B	High	CDBG, State, City, Private
Micro-enterprise Assistance	18C	High	CDBG, Private
Assistance to Institutes of Higher Education	19D	Low	State, Private
Planned Repayment of Section 108 Loans	19F	High	CDBG, City
<u>C. NEIGHBORHOOD CHARACTER</u>			
Acquisition of Real Property	01	High	CDBG, City
Disposition of Real Property	02	High	CDBG, City
Neighborhood Facilities	03E	Low	City, Private
Parks, Recreational Facilities	03F	High	CDBG, City, State
Parking Facilities	03G	High	CDBG, City
Flood/Drain Improvements	03I	Low	City, State
Water/Sewer Improvements	03J	Low	State, Other Federal
Street Improvements	03K	High	CDBG, State
Sidewalks	03L	High	CDBG, State
Tree Planting	03N	High	CDBG, City, Private
Fire Stations/Equipment	03O	Low	City, State, Other Federal
Asbestos Removal	03R	Low	Private
Clearance and Demolition	04	High	CDBG, City
Crime Awareness	05I	Low	City, State, Other Federal
Code Enforcement	15	High	CDBG, City
Residential Historic Preservation	16A	Low	Private
Operation and Repair of Foreclosed Property	19E	Medium	CDBG, City
ACTIVITY	MATRIX CODE	PRIORITY	FUND SOURCE
<u>D. CAPACITY BUILDING</u>			
Public Services (General)	05	High	CDBG, State, Private
Legal Services	05C	Low	Private
Youth Services	05D	High	CDBG, State, Private
Transportation Services	05E	Medium	CDBG, State, Other Federal
Substance Abuse Services	05F	Medium	CDBG, State, Private
Battered and Abused Spouses	05G	Medium	CDBG, State, Private
Employment Training	05H	High	CDBG, State, Private
Tenant/Landlord Counseling	05K	Medium	CDBG, Private
Child Care Services	05L	Low	Private
Health Services	05M	Low	Private
Abused and Neglected Children	05N	Low	State, Private

Mental Health Services	05O	Low	State, Private
Subsistence Payments	05Q	Low	Private
Homeownership Assistance (not direct)	05R	High	CDBG, Private
Non-Profit Organization Capacity Building	19C	Medium	CDBG, Private

OBSTACLES TO MEETING UNDERSERVED NEEDS

The primary obstacle to meeting underserved needs in all four areas is funding. The lack of available funds that has been discussed elsewhere in this plan severely limits the levels of accomplishment that are possible and in many cases forces difficult choices between worthy needs, leaving some unmet.

The extremely high cost of housing in Eastern Massachusetts limits the ability of the City of Lowell to achieve the desired "lifetime city" status where any person of any age and any income level can find quality, safe, and affordable housing and the amenities necessary to support their desired lifestyle.

Economic Development activities are often measured in terms of job creation. Meeting all of the employment needs in any community can be compromised by factors and trends in the global, national, and regional economies that are beyond the control of a local jurisdiction such as the City of Lowell. Taxation policies, labor standards, and regulatory programs of the state and federal government can all also pose obstacles to a city meeting its job creation goals.

Many public service activities have been particularly hard hit by funding cuts at the federal and state government levels as well as from private foundations. When combined with regulatory mandates, even when well-intentioned, that restrict program activities, these can pose obstacle to the success of public service and capacity building activities. Some examples include restrictive definitions of "homelessness" that limit access to certain programs and requirements for criminal background checks for access to certain programs that cause agencies to deny service to individuals based on criminal histories as a means of dealing with severe funding limitations.

SPECIFIC LONG AND SHORT-TERM OBJECTIVES

For each of the activities identified above with a "high" priority, the following tables provide specific output accomplishment goals. Because funding for medium and low priority activities is not expected to be available, accomplishment goals are not provided. A discussion of anticipated outcomes for each conceptual goal follows. Where multiple activities will support the same projects, some have been removed from this table to eliminate potential redundancies.

All proposed and projected accomplishments are five-year goals based on the presumption of continued level funding of all programs at Federal Fiscal Year 2005 levels and are subject to the availability of funds. Accomplishments will necessarily change if funding is reduced or increased during the five year planning period.

A Lifetime City

ACTIVITY	ACCOMPLISHMENT UNITS	GOAL
Acquisition of Real Property	01-People (Area Benefit)	5000
	11-Public Facilities (Senior	1

	Center)	
Disposition of Real Property	01-People (Area Benefit)	5000
Youth Centers	11-Public Facilities	1
Child Care Centers	11-Public Facilities	2
Operating Costs Homeless/AIDS Programs	01-People (Served)	30
Senior Services	01-People (Served)	20000
Handicapped Services	01-People (Served)	2000
Rental Housing Subsidies	04-Households	20
Construction of Housing	10-Housing Units	20
Direct Homeownership Assistance	04-Households	200
Rehab, Single-Unit Residential	10-Housing Units	20
Rehab, Multi-Unit Residential	10-Housing Units	20
Rehab, Publicly-Owned Residential Buildings	10-Housing Units	10
Energy Efficiency Improvements	10-Housing Units	10
Lead-Based/Lead Hazard Test/Abatement	10-Housing Units (Abated)	200

Priority projects in this category include support for the Lowell Senior Center, including continued payment of the lease agreement for the facility, support for public service activities that benefit youth and senior populations, support for a new teen center as well as funding for other public facilities that benefit youth. Housing projects that contribute to the Replication Plan for the Julian Steele reinvention project as well as those located within the Acre Plan area are priorities, as are lead-paint abatement, energy efficiency improvements and housing rehab projects benefiting low- and moderate-income households.

These activities will assist the City of Lowell in moving closer to becoming a true "lifetime city" where residents at all stages of life can find desirable, safe, and affordable housing along with the social and economic opportunities and lifestyle amenities that characterize a desirable place to live. CDBG and other Consolidated Plan funds will support efforts to make this "lifetime city" concept achievable for those at low- and moderate-income levels.

Economic Development

ACTIVITY	ACCOMPLISHMENT UNITS	GOAL
Clearance and Demolition	08-Businesses (Buildings)	8
Clean-up of Contaminated Sites	10-Businesses (Created on Sites)	5
Relocation	08-Businesses	10
Rehab Commercial/Industrial Buildings	13-Jobs	50
Commercial/Industrial Land Acquis./Dispos.	13-Jobs	50
Com./Ind. Bldg Acquis., Construct., Rehab.	13-Jobs	50
Direct Financial Assistance to For-Profits	13-Jobs	50
ED Technical Assistance	08-Businesses	40
Micro-enterprise Assistance	01-People	300

The major economic development priority for the City of Lowell is the Jackson/Appleton/Middlesex (JAM) Urban Revitalization Plan, including the Hamilton Canal District redevelopment project. Other priorities include assistance to small businesses, microenterprises, and activities that help to diversify the City's economy by building on creativity and entrepreneurship. Support for the Downtown Lowell arts and cultural district is also important to continue to strengthen the vitality of this area as a benefit to residents of the entire City.

Recognizing that Lowell's economy is no longer grounded by large manufacturing employers, the City's economic development strategy has changed to one of cultivating a climate that is favorable to diverse small businesses and entrepreneurship. These activities will encourage the development of a stronger entrepreneurial economy and a better educated and more creative workforce in Lowell. These factors will enable Lowell to develop a stronger, more diversified economy that better responds to contemporary circumstances and changes in the marketplace. Success in this area will equal more employment opportunities for Lowell's low- and moderate-income residents.

Neighborhood Character

ACTIVITY	ACCOMPLISHMENT UNITS	GOAL
Acquisition of Real Property	01-People (Area Benefit)	5000
Disposition of Real Property	01-People (Area Benefit)	5000
Parks, Recreational Facilities	11-Public Facilities (Parks)	7
	01-People (Area Benefit)	25000
Parking Facilities	11-Public Facilities (Parking Spaces)	30
Street Improvements	11-Public Facilities (Linear Feet)	5000
Sidewalks	11-Public Facilities (Linear Feet)	1000
Tree Planting	11-Public Facilities (Trees/Projects)	500/100
Clearance and Demolition	10-Housing Units (Demolished)	10
Code Enforcement	10-Housing Units (Inspected)	5000

In addition to supporting both of the aforementioned urban revitalization plans (JAM & the Acre), project priorities in this category include those activities which promote and improve infrastructure and public facilities, as well as those which eliminate substandard and blighting influences through code enforcement and selective demolition.

Over the next 5 years, these activities will serve to enhance and promote the historic and cultural character of its neighborhoods and provide a high quality of life for current and future generations. By enhancing the appearance, pedestrian amenities, and distinctiveness of its neighborhoods, Lowell will foster a sense of solidarity and pride among residents, strengthening community bonds, reducing behaviors such as crime and littering, and encouraging residents to become involved in protecting the character of their neighborhoods. Stronger neighborhoods will also result in higher and more stable property values, fewer abandoned and derelict buildings, and a reduction in property tax delinquency.

Capacity Building

ACTIVITY	ACCOMPLISHMENT UNITS	GOAL
Public Services (General)	01-People (Served)	50000
Youth Services	01-People (Served)	12000
Employment Training	01-People (Served)	200
Homeownership Assistance (not direct)	01-People (Served)	2000

The core intent of these activities is the empowerment of low- and moderate-income residents. These activities provide residents with skills, stability, and core resources

to help clients develop self-sufficiency and independence. Participants in these programs will be better able to complete education, obtain and retain employment, purchase or rent permanent housing, and meet basic needs improving their overall quality of life. Some activities are also aimed at improving the capacity and capabilities of neighborhood associations and other organizations. While these activities will measure their outcomes by the accomplishments of the clients served, their success may not be reflected in overall statistics for the community as new immigrants and others move in with similar needs.

Antipoverty Strategy (91.215 (h))

1. *Describe the jurisdiction's goals, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually). In consultation with other appropriate public and private agencies, (i.e. TANF agency) state how the jurisdiction's goals, programs, and policies for producing and preserving affordable housing set forth in the housing component of the consolidated plan will be coordinated with other programs and services for which the jurisdiction is responsible.*
2. *Identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the jurisdiction has control.*

3-5 Year Strategic Plan Antipoverty Strategy response:

1. GOALS, PROGRAMS, AND POLICIES FOR REDUCING POVERTY

One goal of the Consolidated Plan programs and other initiatives in Lowell is to reduce the number of persons in poverty. The emphasis in Lowell is to help people rise out of poverty, rather than merely easing their situation temporarily. Although essential short-term direct aid such as emergency food and shelter is provided, the thrust of the City's policy is to address poverty's root causes and assist people in becoming self-sufficient in the long-term. Two key components of helping people attain self-sufficiency are employment and housing.

Examples of programs that *directly* influence people's ability to escape poverty include job education, micro-enterprise training and assistance, enrichment, development, and job placement services as well as housing advocacy, homelessness prevention, expiring use prevention, rental and homeownership assistance. Projects that *indirectly* affect poverty include those that upgrade the community, and provide transportation and child care services that help people access employment and services. CDBG, HOME, McKinney, and ESG funds are often used as matching funds for other grants that also contribute to reducing the number of poverty level families. Thus, the power of these federal dollars is leveraged to the fullest extent possible.

Recognizing that limited Consolidated Plan dollars should be focused where the need is greatest, Lowell gives preference to projects that directly benefit low and moderate income residents or serve low and moderate income neighborhoods over those that will benefit the City as a whole. This strategy will enable scarce resources to be directed in order to best serve those who have the greatest need, including the greatest concentrations of poverty.

In addition to Consolidated Plan programs, a number of other public, private, and partnership initiatives have been designed to assist in the reduction of poverty rates. These programs include Lowell's Continuum of Care, the Renewal Community, McKinney grants, the Hunger Homeless Commission, and the SHIFT Coalition.

The SHIFT Coalition in particular is noteworthy as a partnership among non-profits, faith-based organizations, and the city and state governments, including the Department of Transitional Assistance, which is Massachusetts' Transitional Assistance to Needy Families (TANF) agency. The SHIFT coalition has been instrumental in identifying opportunities to creatively focus scarce resources to more effectively assist in reducing homelessness and poverty.

One major success has been moving all of the 138 Merrimack Valley families then residing in state-funded motels and hotels into permanent housing. This effort was accomplished within 6 weeks in July of 2004 due to the intense efforts of all organizations and faith-based agencies. Components included site location and collection of all household goods needed as well as the actual move. It was 100% successful. This action helped these families achieve greater more stability in a more traditional and home-like environments, key factors influencing their ability to rise out of poverty status. The long-term societal costs for these families are also likely to be less than they would have been had they remained in commercial lodgings.

2. IMPACT ON POVERTY RATES

Unfortunately, these efforts, backed by extremely limited funds are unlikely to have significant impact on the total number of poverty level families in Lowell. Factors beyond the control of the local jurisdiction, even with adequate funding, including the regional and national economies and the regional cost of living and housing will be far more influential than any actions that a local government can take. Further, Lowell has historically been a more affordable community for housing and costs of living and is served by better public transportation and social service resources than nearly all of the other towns and cities in the Merrimack Valley. These factors may encourage new immigrants, many of whom live below the poverty level to relocate to Lowell even as other families are able to rise out of poverty, limiting the measurable change in the City's poverty rates.

Nearly 17% of Lowellians are currently in poverty, according to the US Census. This compares to 13.5 percent in 1980 and 18 percent in 1990. Unfortunately, this statistic may not effectively measure the true extent of income-related need. One commonly cited weakness is that the US Census Bureau figures apply uniformly across the country, even though the cost of living ranges widely from region to region, and is particularly high in Eastern Massachusetts. A second weakness identified by the Office of Management and Budget (OMB) is that the US Census poverty statistics are based on assumptions about the cost of food and its percentage as a portion of the family budget. This cost also varies geographically. However, in an area like Eastern Massachusetts where the difference in the cost of housing relative to other regions is significantly higher than the difference in the cost of food, it may further misrepresent the true impact of other costs of living.

The following table illustrates three measures of poverty which might be applied to Lowell. The US Census "official" measure, the OMB guidelines, and the Massachusetts Family Economic Self-Sufficiency Standard (FESS), developed by the Boston-based Women's Educational and Industrial Union (WEIU) and Wider

Opportunities for Women. In a report entitled, *Treading Water in Quicksand: A Look at Poverty, Income Inadequacy and Self-Sufficiency in Massachusetts*, the FESS is defined as the amount of income necessary for a family to meet basic needs (including paying taxes) without public or private subsidies in each county in Massachusetts. The numbers cited below apply to Middlesex County.

Measures of Poverty Status

Size of Family Unit	US Census Poverty Levels	OMB Poverty Guidelines*	Family Economic Self-Sufficiency Standard†
1	\$8,667	\$9,310	\$19,444
2	\$10,869	\$12,490	\$26,742-39,389
3	\$13,290	\$15,610	\$34,626-51,002
4	\$17,029	\$18,850	\$41,954-54,989
5	\$20,127	\$22,030	\$59,390-65,914
6	\$22,727	\$25,210	\$69,952-74,542
7	\$25,912	\$28,390	\$77,036-83,687
8	N/A	\$31,570	\$86,797

* add \$3,980 for each additional person in the family

†In the report, family types are identified by age and status of household members as well as the number in the households.

Sources: US Census Bureau, Office of Management& Budget, Women's Educational and Industrial Union

Ultimately with a median household income of \$39,192 in 2000, many Lowell families struggle to attain self-sufficiency. Nearly all Consolidated Plan funds are spent to benefit people who are clearly falling below the self-sufficiency standard. However, with limited funds, it is difficult to make significant measurable progress toward reducing poverty rates in Lowell by any standard.

Low Income Housing Tax Credit (LIHTC) Coordination (91.315 (k))

1. (States only) Describe the strategy to coordinate the Low-income Housing Tax Credit (LIHTC) with the development of housing that is affordable to low- and moderate-income families.

3-5 Year Strategic Plan LIHTC Coordination response:

-Not Applicable-

NON-HOMELESS SPECIAL NEEDS

Non-homeless Special Needs (91.205 (d) and 91.210 (d)) Analysis (including HOPWA)

1. Estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, and any other categories the jurisdiction may specify and describe their supportive housing needs. The jurisdiction can use the Non-Homeless Special Needs

Table (formerly Table 1B) of their Consolidated Plan to help identify these needs.

**Note: HOPWA recipients must identify the size and characteristics of the population with HIV/AIDS and their families that will be served in the metropolitan area.*

2. *Identify the priority housing and supportive service needs of persons who are not homeless but require supportive housing, i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction by using the Non-homeless Special Needs Table.*
3. *Describe the basis for assigning the priority given to each category of priority needs.*
4. *Identify any obstacles to meeting underserved needs.*
5. *To the extent information is available, describe the facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.*
6. *If the jurisdiction plans to use HOME or other tenant based rental assistance to assist one or more of these subpopulations, it must justify the need for such assistance in the plan.*

3-5 Year Non-homeless Special Needs Analysis response:

1. NON-HOMELESS SPECIAL NEEDS POPULATIONS

The chart below outlines the estimated populations of persons in various identified categories who may have special needs for housing and supportive services in Lowell. The Non-Homeless Special Needs Table elsewhere in this document provides additional information. The population estimates generally differ from those estimated in the City of Lowell's 2000-2005 Consolidated Plan due to differences in the methodology utilized to estimate the populations. For this reason, the statistics below cannot be meaningfully compared to the prior planning document.

CATEGORY	ESTIMATED PERSONS WITH HOUSING NEED	ESTIMATED PERSONS WITH SUPPORTIVE SERVICES NEED
Elderly	2381	3914
Frail Elderly	833	1400
Persons w/ Severe Mental Illness	100	1031
Disabled (Develop. Or Physical)	4604	7500
Alcohol/Other Drug Addicted	500	2842
Persons w/ HIV/AIDS	100	405
Total	8518	16858

The elderly population was estimated using CHAS and Census 2000 poverty data. Frail elderly populations were estimated using CHAS, Census 2000, and MassCHIP (Community Health Information Program) data. Disabled populations were estimated using Census 2000 and CHAS data, as well as Lowell Housing Authority waiting lists. The population with substance addictions and the number of persons with HIV/AIDS were estimated using data collected by the Massachusetts Department of Public Health. Populations with mental illness were estimated using data collected by the Massachusetts Department of Mental Health.

3. PRIORITY NON-HOMELESS SPECIAL NEEDS

The chart below identifies the relative priority needs for various identified special needs categories for housing and supportive services in Lowell. For activities identified as "High" and "Medium" priorities, primary potential Consolidated Plan funding sources are noted.

SPECIAL NEEDS CATEGORY	HOUSING	SUPPORTIVE SERVICES
Elderly	MEDIUM (HOME)	HIGH (CDBG)
Frail Elderly	MEDIUM (HOME)	HIGH (CDBG)
Persons w/ Severe Mental Illness	LOW	LOW
Disabled (Develop. Or Physical)	MEDIUM (HOME)	HIGH (CDBG)
Alcohol/Other Drug Addicted	LOW	MEDIUM (CDBG)
Persons w/ HIV/AIDS	LOW	HIGH (HOPWA)

Activities which are labeled as "High" priorities in the table below and elsewhere in this plan are those which will receive Consolidated Plan funding assuming level funding of the City's formula grants over the next five years. Activities which are identified as "Medium" priorities are those which will likely receive Consolidated Plan funding if the applicable formula grants to the City of Lowell are increased during the next five years and may also receive funds if particularly strong projects are identified. Activities that receive a "Low" priority will not receive Consolidated Plan funding over the next five years without an amendment to this Consolidated Plan.

4. BASIS FOR ASSIGNING PRIORITIES

The priorities for individual Non-Homeless Special Needs categories identified in this plan are derived from the input obtained from numerous outreach efforts, surveys, and consultations used to identify community needs and establish this Consolidated Plan's priorities. Prioritization also takes into consideration feasibility of projects, impact of the costs of larger projects on other priorities, the anticipated funding levels for the Consolidated Plan programs, and other sources of funding that may be available to address established needs.

A "Low" rating does not necessarily diminish this importance of these activities or indicate that there is no need for them in Lowell. Many activities that are assigned a "Low" priority in this plan are nevertheless important needs for the community or high priorities for other sources of funding. Some activities receive "Low" ratings if the funds that are potentially available under the Consolidated Plan programs would be insufficient to have a meaningful impact on these needs or adequately funding them would result in minimal output or outcome accomplishments relative to the amount of funds expended at the expense of other priority programs. The "Low" designations for several special needs housing activities are based on the limited availability of funds. Others receive a "Low" rating if there is less capacity within the institutional structure for this plan to adequately address those needs than is available through state agencies and other entities.

5. OBSTACLES TO MEETING UNDERSERVED NEEDS

The primary obstacle to meeting underserved needs among these populations is limited funding. The lack of available funds that has been discussed elsewhere in this plan severely limits the levels of accomplishment that are possible and in many cases forces difficult choices between worthy needs, leaving some unmet.

The extremely high cost of housing and construction in Eastern Massachusetts severely restricts the City of Lowell's ability to produce new housing units for special needs populations with the limited funds that are available under the Consolidated Plan programs. A very small number of housing units which would have minimal impact on the identified gaps would rapidly exhaust all available funding for other activities.

6. EXISTING FACILITIES AND SERVICES

There are more than 2500 affordable housing units in Lowell for elderly residents. The Lowell Housing Authority maintains more than 500 units in public housing projects for non-elderly special needs populations. More than 130 section 8 certificate holders in Lowell are members of special needs groups. In the Massachusetts Department of Mental Health maintains approximately 23 units in group homes in Lowell and there are at least 25 private group home units for special needs populations.

The following table outlines supportive services and programs that are available for Lowell residents with non-homeless special needs.

POPULATION	FACILITY/AGENCY	SERVICES
Elderly and Frail Elderly	Lowell Housing Authority CTI Private	Subsidized Housing
	Merrimack Valley Elder Services Lowell Council on Aging	Advocacy, case management, support services, mental health, substance abuse and medical services
	Lowell Council on Aging	Meal and Food Programs
	Community Family	Alzheimer's Day Care
Persons with Mental Illness	Gtr. Lowell Mental Health Assoc. Catholic Charities,	Mental Health –Information, Referral and outpatient treatment
	Gtr. Lowell Mental Health Assoc.	Mental Health – Day treatment and community support services
	Teen Health Clinic Saints Memorial Medical Ctr. Lowell Mental Health Assoc. Catholic Charities	Teen Mental Health – Information, referral outpatient treatment
	CASCAP/SHARE Department of Mental Health	Supportive housing
Persons with Disabilities	Lowell Assoc. for the Blind	Education, Social, Advocacy, and other support services for the blind
	Lifelinks, Inc.	Supportive services
	Assoc. for Retarded Citizens Dept. of Mental Retardation Retarded Adult Rehab. Center	Residential, day care, recreation, case management, family support for mentally retarded adults and youth
Alcohol/Drug Addicted	Lowell Comm. Health Center Lowell House, Inc.	Substance abuse - Drug/alcohol detox, outpatient services
Persons with HIV/AIDS	Lowell House, Inc. Lowell Comm. Health Center Catholic Charities	Supportive Services, Education, Advocacy
	Metro Boston Housing Partnership	Tenant-Based Rental Assistance
	Aids Action Committee	Emergency Assistance
	Lowell Comm. Health Center Lowell House, Inc.	Health Care/Prescription Drug Assistance
	Julie House	Supportive Housing
Veterans	Bedford Veteran's Hospital	Short term vocational assistance

	Veterans Administration VA Clinic Veterans Affairs Office	Case management, substance abuse, mental health counseling, medical and psychiatric services
All Special Needs Populations	Merrimack Valley Legal Services	Legal services
	Open Pantry Catholic Charities Merrimack Valley Food Bank Salvation Army Central Food Ministry	Meal and food programs

7. TENANT-BASED RENTAL ASSISTANCE

Lowell anticipates funding tenant-based rental assistance with HOPWA funds during this Consolidated Plan period. The Justice Resource Institute alone maintains a waiting list of 194 clients with HIV/AIDS in need of tenant-based rental assistance in the Lowell HOPWA service area. Other organizations also maintain similar waiting lists.

Lowell may also fund tenant-based rental assistance with HOME funds. The Lowell Housing Authority maintains a waiting list of 332 families for Section 8 tenant-based assistance with an annual turnover rate of 3% or less. The wait list includes 12 elderly families and 96 families with disabilities. If Lowell funds tenant-based rental assistance with HOME funds, it would be used to reduce this demand.

Specific Special Needs Objectives (91.215)

1. *Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.*
2. *Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.*

3-5 Year Non-homeless Special Needs Analysis response:

1. SPECIFIC SPECIAL NEEDS OBJECTIVES

Due to limited funding, the City of Lowell anticipates supporting only those activities identified as "high" priorities among non-homeless special needs. If additional funding is available or a particularly strong project is proposed, "medium" priorities may also be considered. The following table projects the non-homeless special needs populations that will be served with housing and supportive services activities during this five-year consolidated planning period. The totals listed do not necessarily reflect unique persons served since many activities will continue to serve ongoing needs of the same individuals for more than one program year.

SPECIAL NEEDS CATEGORY	HOUSING	SUPPORTIVE SERVICES
Elderly & Frail Elderly	N/A	20,000 people
Disabled (Develop. Or Physical)	N/A	2,000 people
Persons w/ HIV/AIDS	750 people	2,000 people

2. USE OF AVAILABLE RESOURCES

Many public service activities that have traditionally been funded through the CDBG program in Lowell serve the priority special needs populations identified above. The City of Lowell anticipates that these activities will continue to receive support. HOPWA funding will be used to assist with the supportive service needs of persons with HIV/AIDS in Lowell and throughout Middlesex County as is detailed below. Efforts will be made to insure that supportive services are available in all areas of need within the county.

Additionally, the Commonwealth of Massachusetts through the Department of Mental Health, the Department of Public Health, the Division of Elder Services, and other agencies provides funding for a variety of housing and supportive services programs that serve many special needs populations in Lowell.

Housing Opportunities for People with AIDS (HOPWA)

1. *The Plan includes a description of the activities to be undertaken with its HOPWA Program funds to address priority unmet housing needs for the eligible population. Activities will assist persons who are not homeless but require supportive housing, such as efforts to prevent low-income individuals and families from becoming homeless and may address the housing needs of persons who are homeless in order to help homeless persons make the transition to permanent housing and independent living. The plan would identify any obstacles to meeting underserved needs and summarize the priorities and specific objectives, describing how funds made available will be used to address identified needs.*
2. *The Plan must establish annual HOPWA output goals for the planned number of households to be assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. The plan can also describe the special features or needs being addressed, such as support for persons who are homeless or chronically homeless. These outputs are to be used in connection with an assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.*
3. *For housing facility projects being developed, a target date for the completion of each development activity must be included and information on the continued use of these units for the eligible population based on their stewardship requirements (e.g. within the ten-year use periods for projects involving acquisition, new construction or substantial rehabilitation).*
4. *The Plan includes an explanation of how the funds will be allocated including a description of the geographic area in which assistance will be directed and the rationale for these geographic allocations and priorities. Include the name of each project sponsor, the zip code for the primary area(s) of planned activities, amounts committed to that sponsor, and whether the sponsor is a faith-based and/or grassroots organization.*
5. *The Plan describes the role of the lead jurisdiction in the eligible metropolitan statistical area (EMSA), involving (a) consultation to develop a metropolitan-wide strategy for addressing the needs of persons with HIV/AIDS and their families living throughout the EMSA with the other jurisdictions within the EMSA; (b) the standards and procedures to be used to monitor HOPWA Program activities in order to ensure compliance by project sponsors of the requirements of the program.*

6. The Plan includes the certifications relevant to the HOPWA Program.

3-5 Year Strategic Plan HOPWA response:

1. PRIORITY UNMET NEEDS

The HOPWA funds received from the Department of Housing and Urban Development (HUD) will be used by a number of organizations across Middlesex County to address the unmet housing needs for the eligible population. These activities include not only direct dollar assistance, but also the services critical to this special needs population.

The following table outlines the priority HOPWA needs for Middlesex County. Activities marked as "High" priorities will receive funding during the five-year Consolidated Plan period. Those marked as "Medium" priorities may receive funding if funding levels increase or particularly strong proposals are submitted. Activities marked as "Low" priorities will not be funded during the five-year plan period due to limited availability of funds.

Activity	Priority	Funding Source
Tenant-Based Rental Assistance	High	HOPWA, Other
Short-Term Rent, Mortgage and Utility Payments	High	HOPWA, Other
Facility-Based Programs	Medium	HOPWA, Other
Operating Costs for Facility-Based Programs	High	HOPWA, Other
New Facilities Developed with Capital Funds	Low	Other
Supportive Services in Conjunction with Housing Activities	High	HOPWA, Other
Housing Information and Placement Services	High	HOPWA, Other
HOPWA Technical Assistance	High	HOPWA, Other

The following organizations will assist in the delivery of HOPWA-related services and activities for the Middlesex County HOPWA region.

The **Metropolitan Boston Housing Partnership** (MBHP) has a 22 year history of assisting low-mod income families and individuals to find/keep housing and move towards economic stability. It provides tenant based rental assistance to 13 persons living with HIV/AIDS in Middlesex County and works with Justice Resource Institute to identify clients and their eligibility/need for permanent housing in tenant based rental units that are safe and meet standard codes

Justice Resource Institute (JRI) Health provides services (supported referrals, hands-on housing search, case management, ongoing needs assessments, etc.) to about 12 individuals and households utilizing Section 2 and HOPWA certificates. JRI also coordinates Tenant Based Rental Assistance services through its statewide initiative to the disabled, homeless or those at great risk of homelessness, who are living with HIV disease

South Middlesex Opportunity Council (SMOC) offers the Housing Re-Entry Program for inmates at risk of becoming homeless, sober housing, Housing Assistance Program (HAP) and Housing Consumer Education Center (HCEC) which included housing information, search and advocacy. Its Counseling Program serves about 50 households (30% families, 70% individuals) for clients living with HIV/AIDS.

AIDS Housing Corporation (AHC) offers housing providers, AIDS service organizations, City staff and local communities within Middlesex County HOPWA

region, assistance with developing new and supporting existing programs which helps them meet the housing needs of persons living with HIV and AIDS.

Cambridge Cares About AIDS, Inc. (CCAA) provides tenant based rental assistance via its Men's Open Door SRO Housing program at the YMCA and provides 15 rooms for homeless men living with HIV/AIDS. CCAA's Ruah House Project provides permanent housing for 7 homeless women living with HIV/AIDS and offers 24 hour staff coverage for those with compromised Activities of Daily Living by ensuring access to medical, mental health and social service agencies.

Merrimack Valley Catholic Charities AIDS Outreach Center provides emergency assistance such as short term rent, utility assistance, arrearages, start-up and back rent for at least 10 families a month from the very large HIV/AIDS populations. The organization's Julie House provides permanent housing and support services for 10 men and women with HIV/AIDS who are homeless or at risk of becoming homeless and is one of only 2 such programs in the entire Merrimack Valley.

Lowell House, Inc. (LHI) has provided services in the Greater Lowell community for over 35 years. The agency operates 2 residential recovery programs, housing 48 men and women. It provides HIV support services to approximately 150 HIV/AIDS clients.

Tri-City Community Action Program, Inc. is continuing its current program of supportive services and case management as well as tenant based rental vouchers for chronically homeless individuals with HIV/AIDS. The program serves about 50 clients annually.

AIDS Action Committee's (AAC) Rental Assistance Program serves 60 unduplicated clients living with HIV/AIDS in Middlesex County. AAC works with over 60 providers and maintains a provider database. The population served includes HIV/AIDS clients who are homeless, in need of affordable housing, chronically homeless persons, ex-offenders, people with mental illness, those facing imminent eviction and those struggling with addiction.

The special needs of those persons with HIV/AIDS who have some type of housing include access to medical care, assistance with prescription drug costs, job training, counseling for those with mental health issues including depression, fair wage employment, furniture banks, food pantries and food vouchers and legal assistance.

The special needs of HIV/AIDS persons without housing include all of the above, but multiplied by at least a factor of two. Obstacles to meeting underserved needs include: CORI checks that are not "cleanable," a lack of Section 8 vouchers, mental health issues and continued substance abuse. Emergency shelters are not a viable option for persons living with compromised immune systems and trying to follow medical treatment because: (1) medications cannot be stored or are easily lost; (2) strict schedules for taking medications can't be followed, and (3) exposure is very high to infections and sickness. All research now agrees that the most critical issue for someone with HIV/AIDS is that they be permanently housed. They are far more likely to have improved health if they have a place to live. All of the organizations listed above provide supportive services and/or direct assistance for housing costs. They serve approximately 400 HIV/AIDS clients with these special needs on an annual basis.

The HOPWA funding (\$623,000 for 2005-06) granted to Middlesex County will help alleviate some of the conditions as described above. Many of these programs have received HOPWA funding in prior program years from the City of Boston, the City of Cambridge, and/or the Commonwealth of Massachusetts. Some of these organizations will now utilize HOPWA funding from the City of Lowell to replace HOPWA grants from these other sources that will no longer be available to them due to the restructuring of HOPWA grant distribution and administration in Massachusetts.

2. OUTPUT GOALS

- (a) At least 80 households will be assisted annually with short-term rent, mortgage and/or utility payments via HOPWA grants made to the AIDS Action Committee, Catholic Charities, and Tri-City Community Action Programs, Inc.
- (b) Tenant-based rental assistance will be proved to approximately 30 households annually using HOPWA funds granted to Metropolitan Boston Housing Partnership and CCAA.
- (c) The housing facilities such as Catholic Charities' Julie House and the CCAA Ruah House provide housing to about 15 individuals annually, using HOPWA funding for facility operation.

Special needs being addressed include referrals for medical care, assistance with prescription drug needs, transportation, classes for learning life skills, and mental health counseling. These services are provided in part to prevent homelessness as described above.

The combination of these housing services and the special needs supportive services described in this plan is designed to make progress toward the desired outcome of increased housing stability for those persons with HIV/AIDS in Middlesex County who receive services. Unfortunately, limited access to Section 8 certificates, reduced funding for social services by the Federal and state governments and the private sector, and increasing life expectancy for persons living with HIV/AIDS adversely impact progress toward the true outcome goal of increased housing stability for all persons with HIV/AIDS in Middlesex County.

3. HOUSING FACILITY PROJECTS

Due to the limited funding available, the size of the service area, and the extremely high costs of property acquisition and development in Eastern Massachusetts, the City of Lowell does not anticipate using HOPWA funds for projects to construct new permanent housing for persons with HIV/AIDS during the Consolidated Plan period. One project to create 6-10 units where the need is greatest might easily absorb all available HOPWA funds for the five-year period.

4. GEOGRAPHIC ALLOCATION

The City of Lowell is responsible for administering the HOPWA grant for all of Middlesex County. As a result, efforts will be made to ensure that supportive services are available in each of the areas of concentration of persons with HIV/AIDS in the County (Cambridge/Somerville, Lowell, Framingham, and Malden/Medford). Priority will also be given to supporting programs which service all or large portions of the County.

The following table identifies the primary HOPWA service providers in Middlesex County by service area and zip code. Merrimack Valley Catholic Charities is a faith-based organization.

Agency	Middlesex County Service Area	Zip Code
Metropolitan Boston Housing Partnership	Southeastern Middlesex County ¹	02111 (Boston, MA)
Justice Resource Institute	County-wide (primarily Greater Boston)	02116 (Boston, MA)
Southern Middlesex Opportunity Council	Metrowest ²	01702 (Framingham, MA)
AIDS Housing Corporation	County-wide	02116 (Boston, MA)
Cambridge Cares About AIDS	Cambridge area ³	02139 (Cambridge, MA)
Merrimack Valley Catholic Charities	Greater Lowell ⁴	01852 (Lowell, MA)
Lowell House	Greater Lowell ⁴	01854 (Lowell, MA)
Tri-City Community Action Programs	Malden/Medford/Everett	02148 (Malden, MA)
AIDS Action Committee	County-wide	02108 (Boston, MA)

1. Including Arlington, Bedford, Belmont, Burlington, Cambridge, Lexington, Malden, Medford, Melrose, North Reading, Reading, Stoneham, Wakefield, Watertown, Wilmington, Winchester, and Woburn.
2. Including Ashland, Framingham, Holliston, Hopkinton, Hudson, Marlborough, Maynard, Natick, Sherborn, Stow, Sudbury, Waltham, Wayland, Weston.
3. Including Arlington, Cambridge, Everett, Malden, Medford, Somerville, and Watertown.
4. Including Billerica, Chelmsford, Dracut, Lowell, Tewksbury, Tyngsborough, and Wilmington.

The only portion of the County that is not well served by these organizations is far northwestern Middlesex County, which has a much lower population density and a far lower incidence of HIV/AIDS diagnoses.

5. ROLE OF LEAD JURISDICTION

CONSULTATIONS

The City of Lowell worked with AIDS Housing Corporation, under a HOPWA technical assistance grant, to conduct extensive research and outreach to document the nature and extent of HIV/AIDS cases in Middlesex County and develop a County-wide strategy for defining and addressing the most important needs within the county. The process of developing this plan included direct consultations with all existing service providers and two focus groups with service providers and clients that were discussed earlier in this document. The City of Lowell also remains involved with the Association of Housing Administrators Group (AHAG) in their efforts to develop a regional strategy for assisting persons with HIV/AIDS-related housing needs. Finally, through the SHIFT Coalition, Lowell's Continuum of Care, and the State Interagency Council, Lowell remains involved in ongoing efforts to collaboratively address housing and homelessness-prevention issues on city, county, and state-wide levels.

MONITORING

The City of Lowell will implement a HOPWA subrecipient monitoring program consistent with the monitoring policy outlined earlier in this document. HOPWA subrecipients' compliance with applicable program regulations and requirements will be reviewed and documented through site visits, telephone interviews, written progress reports, and careful reviews of invoices submitted.

6. CERTIFICATIONS

The required program certifications are included in the final plan.

Specific HOPWA Objectives

1. *Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.*

3-5 Year Specific HOPWA Objectives response:

Currently, over \$1.5 million is spent on housing related services in Middlesex County for persons living with HIV/AIDS. If HOPWA, Massachusetts Department of Public Health's AIDS Bureau, CARE Act (Title 1), and Ryan White CARE Act funding remains reasonably level, Lowell will continue to address the identified needs for the years covered by this Five-Year Consolidated Plan. Funding, however, does not allow for any new development with HOPWA funds. It will permit us to continue to provide housing and supportive services to HIV/AIDS clients over the five year strategic plan period and will include assisting with housing information and advocacy services through Tri CAP in Malden, SMOC in Framingham, CCAA in Cambridge, JRI in Boston and the Lowell House in Lowell. In addition, funds will be spent on emergency rental assistance to prevent homelessness, and rental start-up funds to help pay for first and last month's rent as well as security deposits primarily through the AIDS Action Committee's Rental Assistance Program and Catholic Charities emergency assistance program. Being suitably housed is critical for positive health outcomes for persons with HIV/AIDS – and the greatest need for these persons is permanent, affordable housing. Key to getting and keeping people housed are the supportive services such as case management, supportive housing staff, housing advocacy, assistance with health services, both physical and mental, etc. The City of Lowell will continue to act in collaboration with other organizations across the county as well as with other funders in order to leverage dollars.